

8.0 PUBLIC PARTICIPATION AND AGENCY COORDINATION

This chapter updates the information presented in Chapter 8 of the DEIS regarding the public participation and agency coordination that has occurred as part of the project. The comprehensive public participation and agency coordination process initiated by the Michigan Department of Transportation (MDOT) at the beginning of the project in December 1994, as described in Chapter 8 of the DEIS, continued through the development of this FEIS.

In addition to describing the public and agency coordination that has occurred since publication of the DEIS, this chapter provides individual responses to the governmental agency comments received on the DEIS. A general summary of all comments received on the DEIS is also presented in this chapter, with responses to major areas of concern.

8.1 Public Participation

In addition to the newsletters noted in Section 8.1 of the DEIS, a project newsletter was published in October 2003, summarizing the project's historical highlights and announcing the Recommended Alternative and upcoming project events.

The use of informational meetings, surveys, meeting notices, the Web site, the local telephone number, and flyers, as noted in the DEIS, continued through preparation of this FEIS.

8.1.1 Citizens Advisory Committee

As noted in the DEIS, the Citizens Advisory Committee (CAC) was established early in project development and was composed of representatives from special interest groups, block clubs, community organizations, school district administration, business and institutional groups. The CAC reviewed proposed alternatives and their input was used in defining and evaluating the alternatives considered in preparation of the DEIS. No current activity since the DEIS.

8.1.2 Public Information Meetings

In addition to the eight public information meetings noted in the DEIS, four additional meetings (listed in Table 8-1) were held following publication of the DEIS.

Table 8-1: Public Information Meetings (after 2001)

Date	Location
3/5/2001	Museum of African American History
3/6/2001	Wayne County Community College
10/ 21 /2003	Museum of African American History
10/ 22 /2003	Wayne County Community College

The March 2001 meetings were the official public hearings held after publication of the DEIS. Oral testimony from these hearings was recorded, and the general public and agencies were invited to comment on the DEIS in the comment period that followed. The issues raised at these meetings and in the comment period and responses are summarized in FEIS Section 8.3.

The October 2003 public information meetings were held as open-house style format. Approximately 15,000 postcards were mailed advertising the event. More than 100 people

attended the two information meetings. The purpose of these meetings was to describe the project, the process, the schedule, and to show how the project addressed the comments received from the public, the Detroit City Council, the city of Detroit administration, and other agencies to provide a Recommended Alternative. Participants were invited to comment on the Recommended Alternative, as well as request a special meeting with the MDOT study team to discuss the project with any interested groups or stakeholders. Information was also available about the upcoming December 2003 historical workshop and February 2004 Context Sensitive Solutions workshops and a sign up list to attend was also provided.

8.1.3 Neighborhood and Organization Meetings

The DEIS noted that approximately 100 meetings were held with requesting groups, including: local institutions, business associations, neighborhood councils, churches, and other local organizations. This outreach effort to local groups was continued following publication of the DEIS. The key issues raised at these meetings included design features of the Recommended Alternative, project timeline, funding, property displacements, noise abatement, freeway aesthetics, construction phasing and access during construction, among others. Appendix I updates the list of representative meetings contained in the DEIS.

8.1.4 Citizens Impact Survey

As stated in the DEIS, a telephone survey of 450 residents was conducted in September 1995 to assess the awareness, usage, impact, and concerns of local residents and businesses. The survey also collected demographic information and information regarding public reaction. The project area has had no significant land use changes since 1995, so the results of the Citizens Impact Survey is still valid for the area.

8.1.5 Focus Group Studies

As noted in the DEIS, two project area focus group studies were conducted in August 1995 to identify critical issues and design quantitative research data-collection instruments for the project. One group consisted of 16 adult residents who lived within one mile of the I-94 Project Area, and the other consisted of seven small business owners. No new focus group studies were held since the DEIS, but meetings upon request with residents and community groups, as well as public agencies were held to provide and obtain feedback on the development of the Recommended Alternative.

8.1.6 Continuing Public Involvement

The DEIS described a project-related Web site that was developed to respond to public comment. The 24-hour-a-day accessible Web site (<http://www.michigan.gov/mdot> under Projects and Programs) contained the DEIS, projects maps, frequently asked questions and answers, a project schedule, and the opportunity to e-mail comments regarding the project. After the official DEIS comment period, the Web site was updated to reflect project progress related to selection of the Recommended Alternative and preparation of this FEIS. The FEIS, DEIS, other project information, and opportunity to e-mail comments will continue to be available on the project Web site through completion of the Record of Decision (ROD).

As stated in the DEIS, following the publication and distribution of the DEIS, two public hearings were held at different locations and times within the corridor to receive comments on the document. Refer to FEIS Section 8.1.2 for the locations of these meetings and FEIS Section 8.3 for a summary of comments received on the DEIS.

8.2 Agency Coordination

The DEIS stated that, in January 1995, coordination letters describing the project were sent to interested agencies. Coordination with these agencies was continued through preparation of this FEIS. This FEIS will be distributed for review and comment to the agencies listed in Chapter 9.

8.2.1 Interagency Coordination Committee

As described in the DEIS, the Interagency Coordination Committee (ICC) was established as a steering committee for the I-94 project and included representatives from the MDOT, city of Detroit, Southeastern Michigan Council of Governments (SEMCOG), FHWA, Wayne County, the Detroit Department of Transportation (DDOT), the Suburban Mobility Authority for Regional Transportation (SMART), and Macomb County. Four additional ICC meetings were held following the publication of the DEIS. The ICC helped refine the Recommended Alternative presented in this FEIS.

8.2.2 Agency and Local Government Meetings

As noted in the DEIS, numerous meetings were conducted since December 1994 with public officials and agency representatives to discuss project issues relevant to specific areas of interest and jurisdiction. Meetings included representatives from federal, state, and local agencies. Collaboration with public official and agency representatives was an integral part of the selection of the Recommended Alternative and preparation of this FEIS.

As a result of this continued collaboration, the Detroit City Council in August 2003 issued a resolution of support for the Recommended Alternative. Also of note is that, after the October 2003 Public Information Meetings, the MDOT study team met with leaders of the Planning and Development Department, Advanced Planning, and Cluster leaders. An initial group meeting in December 2003 was held followed by individual Cluster meetings in January 2004. These meetings were conducted as part of the environmental justice and indirect and cumulative effects analyses prepared for this FEIS and afforded Cluster leaders the opportunity to comment on the Recommended Alternative and voice community issues related to the project. Appendix I contains an updated list of meetings held, dates, and topics discussed.

8.2.3 Context Sensitive Solutions and Historical Workshops

Following publication of the DEIS, the MDOT included four community workshops as part of the public involvement program for the project. The dates and locations of the three Context Sensitive Solutions (CSS) workshops (the first workshop was titled “Mitigation Day”) and historical workshop are shown in Table 8-2.

Table 8-2: Community Workshops

Date	Location
<i>Context Sensitive Solutions Workshops</i>	
October 2001	Lansing Aeronautics Building
February 2004	African American Museum
February 2004	St. Regis Hotel
<i>Historical Workshop</i>	
December 2003	Wayne State University

The CSS workshops provided an ongoing process to receive stakeholder input as well as encourage buy-in and ownership for the project. Participants brainstormed ideas to make the project a part of the local community and were shown successful examples from other locations throughout the country. Partnering opportunities also were discussed as part of these workshops. Feedback received at these workshops was positive, and the community was excited about creating an identity on the service drives, overpasses, and mainline I-94. A summary of the CSS workshop contents is provided in Appendix G. The CSS workshops will continue in the design phase of the project.

The historical workshop in December 2003 at Wayne State University was open to interested individuals. The areas discussed included 5287 Hecla Street that is part of the Woodbridge Historic District, United Sound Studios on 2nd Street, and the M-10/I-94 historic interchange design. The workshop discussion is summarized in Appendix G and input received at the workshop is incorporated into the MOA.

8.3 Overview of Response to DEIS

Seven-hundred and thirty-four (734) comments were received on the DEIS. Comments were received from three federal agencies, one U.S. Congressman, three city of Detroit municipal agencies, the city of Ferndale, the Wayne County Department of Public Services and 13 additional organizations, including five comments from private businesses. More than 700 comments were received from the general public. The comments provided by the governmental agencies and the individual responses to these comments are presented in this chapter. A general summary of all comments received on the DEIS is also presented in this chapter, with responses to major areas of concern. Original copies of all general public (including oral testimony from the public hearings) and special interest correspondence are contained in Appendix J and can be reviewed at the locations with this FEIS. In these locations, the package available for review contains a complete set of the comments received on the DEIS, a summary of all comments, and all written responses documented in the current chapter.

8.4 Agency Letters and Responses

The comment letters received from the following agencies are reproduced on the following pages. This section provides responses to issues raised in the comment letters:

Letter 1: United States Department of Agriculture

Letter 2: United States Department of Interior

Letter 3: United States Environmental Protection Agency (U.S. EPA)

Letter 4: Southeast Michigan Council of Governments (SEMCOG)

Letter 5: City of Detroit, Department of Planning and Development

Letter 6: City of Detroit, Department of Public Works

Letter 7: City of Detroit, City Planning Commission


Letter 8: City of Ferndale

Letter 9: United States Congressman John Conyers Jr., Detroit

Letter 10: Wayne County, Department of Public Services

Letter 1: U.S. Department of Agriculture

State of Michigan



JOHN ENGLER, Governor

Department of Agriculture

DAN WYANT, Director

Commission of Agriculture
Douglas E. Darling
James E. Maitland
William G. Pridgeon
Jordan B. Tatter
Nora M. Viau

March 6, 2001

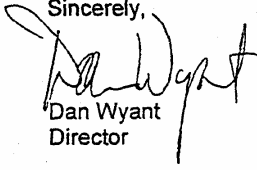
Mr. Ronald S. Kinney, Manager
Environmental Section
Project Planning Division
Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Mr. Kinney:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the I-94 Rehabilitation Project within the City of Detroit. The Rehabilitation Project would provide transportation improvements to 6.7 miles of I-94 (Edsel Ford Freeway) from east of I-96 on the west end to immediately east of the Conner Avenue interchange on the east end. The preferred "Build Alternative" would involve the total reconstruction of this section of highway, complete with new bridges, ramps, etc.

The potential environmental impacts of concern to this department are the runoff and drainage impacts to the existing system of county and inter-county drains. We recommend continual contact with Mr. James Abron, P.E., Wayne County Drain Commissioner, throughout the development of this proposal, particularly if the "Build Alternative" is pursued. Mr. Abron's telephone number is (313) 224-6665.

Again, thank you for the opportunity to comment.

Sincerely,

Dan Wyant
Director

611 W. OTTAWA • 4th FLOOR • PO BOX 30017 • LANSING, MI 48909-7512
www.mda.state.mi.us

1-1

Response 1-1

The Wayne County Department of Environment, Division of Public Works, Drain Maintenance Office was contacted to determine if there were county or intercounty drains in the vicinity of the I-94 project. It was stated that no county or intercounty drains were located in the project area. The project does drain into city of Detroit Water and Sanitary District combined sewers. Increased runoff will be detained on the project and released into city of Detroit sewers at a rate that will not exceed the pre-construction rate. Further information related to the project's water quality is contained in Section 5.9 of this FEIS.

Letter 2: U.S. Department of Interior



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ER-01/112

MAR 30 2001

Mr. James J. Steele
Division Administrator
Federal Highway Administration
315 West Allegan Street, Room 207
Lansing, Michigan 48933-1528

Dear Mr. Steele:

As requested in your February 9, 2001, letter, the U.S. Department of the Interior (Department) has reviewed the January 2001 Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for the proposed rehabilitation of the I-94 corridor from I-96 to Conner Avenue in Detroit, Wayne County, Michigan. The Department offers the following comments and recommendations for your consideration.

SECTION 4(f) EVALUATION COMMENTS

We concur that there is no feasible and prudent alternative to the proposed project, if project objectives are to be met. We also concur with the proposed measures to minimize harm to the Woodbridge Neighborhood Historic District, which is listed on the National Register of Historic Places (NRHP), and the following NRHP-eligible structures: the house at 5287 Hecla Street, the store at the corner of Trumbull and the I-94 service drive, the I-94/M-10 interchange bridges, and the United Sound Systems Recording Studios. A signed memorandum of agreement that demonstrates that the Michigan State Historic Preservation Officer and the Advisory Council for Historic Preservation concur with the proposed mitigation should be included with the final Section 4(f) Evaluation. The Department has no objection to Section 4(f) approval of this project by the Department of Transportation.

ENVIRONMENTAL IMPACT STATEMENT COMMENTS

The DEIS adequately addresses other issues of concern to the Department. We have no specific comments on the DEIS. We appreciate the opportunity to provide these comments.

Sincerely,

Willie R. Taylor
Director, Office of the Environmental
Policy and Compliance

2-1

Response 2-1

The Memorandums of Agreement (MOA) for all NHRP-eligible structures have been completed and are contained in Appendix E.

Letter 3: U.S. Environmental Protection Agency (EPA)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 11 2001

REPLY TO THE ATTENTION OF:

B-19J

Mr. James A. Kirschensteiner
Federal Highway Administration
Programs & Environmental Engineer
315 West Allegan
Room 211
Lansing, Michigan 48933

Re: Comments on the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the I-94 Rehabilitation Project from I-96 to Conner Avenue, Detroit, Wayne County, Michigan, EIS No. 010041

Dear Mr. Kirschensteiner:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the I-94 Rehabilitation Project from I-96 to Conner. This DEIS evaluates transportation improvements proposed for a 6.7-mile portion of I-94 from I-96 on the west to Conner Avenue on the east. Two major interchanges in this segment, the M-10 Lodge freeway and the I-75 interchanges are also being proposed for reconstruction.

Information provided in the DEIS indicates that there are problems that need to be addressed along this 6.7-mile long section. This section of I-94 was built in the 1940's and 1950's. The geometrics, pavement and bridge conditions are below standard. Currently, the mainline of I-94 is 6-lanes (three in each direction), there are incomplete acceleration/deceleration lanes, and some service drives exist but they are not continuous. The DEIS states that traffic volumes are heavy during most daylight hours with some segments operating over capacity during peak periods. Under the No-Build scenario, most segments of I-94 would operate at LOS D or F in the year 2020 during the peak hours. It is clear that some action is needed in this area in order to improve capacity, safety, pavement and bridge conditions on I-94. The action is also needed to enhance local traffic circulation in the area.

Three alternatives are evaluated in detail in the DEIS: (1) the No-Build Alternative, (2) the Enhanced No-Build Alternative, and (3) the Build Alternative. The No-Build Alternative would involve no construction on I-94 and would only include maintenance of the existing facility and replacement of bridges as they deteriorate. The Enhanced No-Build Alternative would reconstruct the existing freeway and bridges, improve shoulders and ramps, construct auxiliary, acceleration and deceleration lanes while maintaining the freeway, interchanges and bridges. The Build Alternative would consist of addition of two driving lanes on the I-94 mainline (one in each

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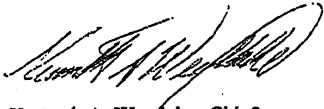
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direction), acceleration/deceleration lanes and three-lane continuous service drives on both sides of the interstate. The existing roadway and bridges would be reconstructed and space would be reserved in the median to accommodate future lane expansion or transit.

U.S. EPA has reviewed the DEIS and other associated documents. Our review has identified several issues that were not adequately addressed in the DEIS. These issues are in the areas of Scope of Analysis, Purpose and Need, Alternatives Analysis, Air Quality, Noise, Pedestrian and Bicyclist Impacts, Costs, and Cumulative Impacts. Our detailed comments are provided in the enclosure titled: *U.S. EPA Comments on the I-94 Rehabilitation Project Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation, May 2001*. Based on these comments, the U.S. EPA rates the DEIS as "EO-2." A copy of our rating criteria is enclosed.

Thank you for the opportunity to comment on this DEIS. We are always available to discuss these comments if you would find that useful. Please contact Sherry Kamke of my staff at 312-353-5794 for any questions or concerns that you would like for us to address.

Sincerely,



Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

cc: Jeff Saxby, MDOT
Gerald Fulcher, MDEQ

3-1 cont.

SEP 8 Region 5 USEA ID:312-353-5374 MAY 11 01 14:07 No.008 P.03

U.S. EPA Comments on the I-94 Rehabilitation Project
Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation
May 2001

Scope of Analysis

The proposed action would involve improvements to a 6.7-mile portion of I-94 from I-96 on the west to Conner on the east yet the traffic study limits extend past this area to include additional segments on the east and west of this project. The DEIS makes a reference on page 3-5 to "a series of proposed projects to improve the transportation system in Detroit and southeast Michigan" and references that this project "is the first of other I-94 improvement projects in southeast Michigan." No other specific details are included in the DEIS. U.S. EPA sought additional information regarding other I-94 projects that were being contemplated. MDOT's Five-year Road and Bridge Program - Volume III 2001-2005 (p.81) indicates that the I-94 project from I-96 to Connor Avenue is the first phase of a larger project extending from Wyoming Avenue in the city of Detroit to I-696 in Macomb County. The Build Alternative that is evaluated in detail in the DEIS makes more sense as part of an improvement program for a larger segment of I-94 than what is evaluated within this DEIS. Otherwise, the improvements to the mainline, auxiliary and service drive lanes will end at this project's termini, which has the potential to create bottlenecks at a point where the roadway capacity drastically decreases.

3-2

Due to the issues discussed above, we question whether the evaluation conducted in this DEIS meets the requirements specified in the Federal Highway Administration (FHWA) NEPA implementing regulations at Title 23 Code of Federal Regulations (CFR) Part 771.111 (f). The regulations discuss what scope of analysis is appropriate in order to ensure a meaningful evaluation of alternatives and in order to avoid commitment to transportation improvements before full evaluation. We have concerns related to how this project's scope meets the requirements for logical termini, independent utility and appropriate consideration of alternatives for other foreseeable transportation improvements on I-94. We suggest that FHWA reconsider its termini points. We recommend that FHWA and MDOT evaluate I-94 improvements using a tiered EIS process. The first tier would evaluate improvements on the 18-mile segment of I-94 from Wyoming Avenue to I-696 and then segment-specific EISs would tier off from that first tier EIS. This approach would allow for a broad consideration of improvements along the entire corridor.

Purpose and Need

The information presented in the DEIS clearly shows that there are problems that need to be addressed in the I-94 Corridor from I-96 to Connor. The problems of deteriorating pavement and bridges, along with the lack of shoulders and substandard interchanges, are apparent. It is clearly prudent to address the need for system improvements at the same time infrastructure maintenance is addressed. We note that there is a long history of planning and major investment study work conducted in this area. We believe that it is important to draw on these previous studies wherever possible while recognizing changes that have occurred since those studies were conducted.

3-3

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EPA concurs that there is a real need for improvements in the I-94 corridor. However, as we have mentioned under "Scope of Analysis" above, we question why MDOT and FIIWA have scoped the project as they have.

We have additional questions regarding statements made in DEIS regarding truck traffic on I-94. We note that the Purpose and Need Section on page 2-12 states that Average Annual Daily Traffic (AADT) is at 120,000 - 160,000, and it is expected to grow by more than 25 percent by the year 2020. This growth doesn't include international border crossings and the associated amount of heavy-truck traffic, which is expected to grow at a rate three times faster than passenger vehicle volume. The DEIS mentions the North American Free Trade Agreement (NAFTA) and how international trade is increasingly important to Michigan's economy. However, there is no information in the DEIS that discussed how NAFTA has affected international traffic and what that might mean for the Detroit area. If the I-94 corridor is experiencing increasing traffic or will likely be experiencing increased traffic because of NAFTA, additional information should be provided in NEPA documentation reflecting this.

3-4

Similarly, the DEIS shows a location of the proposed intermodal freight facility in Figure 2-1, a figure depicting the Traffic Study, Project Limits and Intermodal Freight Facility. No other information is presented within the text of the DEIS to explain how the siting of an intermodal freight facility may impact local, regional and international truck and rail traffic patterns. More information on the current and future projections for local, regional and international freight traffic should be included in subsequent NEPA documentation.

3-5

Alternatives Analysis

The DEIS evaluates a No-Build Alternative, an Enhanced No-Build Alternative and the Build Alternative. U.S. EPA views the Build Alternative as consisting of five components: (1) Rebuild/enhance capacity on existing I-94 mainline with addition of shoulders and auxiliary lanes, (2) Interchange improvements (including acceleration/deceleration lanes), (3) Bridge replacements, (4) Service drive enhancements, and (5) Preservation of median space for future expansion.

The DEIS summarizes the process by which alternatives were selected for further evaluation. Although the Alternatives section does an adequate job of describing why many highway design options were eliminated, it does not provide enough of information to substantiate why transit alternatives were eliminated from consideration. It appears, based on information presented on page 4-15, that the only transit alternative that was evaluated is a bus alternative that would utilize High Occupancy Vehicle (HOV) lanes. The HOV lane alternative was eliminated because the FIIWA guideline for a minimum threshold of 500 vehicles per hour per lane would not have been met. The rationale for the elimination of the HOV lane alternative stated "to optimize the benefits and be most effective, the HOV lanes would have to extend beyond the study limits of the project."

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USFPA Region 5 USFPA

It isn't clear from the information presented in the DEIS what segment length was used in the HOV analysis. Also, it wasn't clear what traffic projections (current or design year [2020]) were used. The NEPA documentation should describe in more detail what the basis was for eliminating this alternative from consideration.

Similarly, the DEIS does not provide an adequate discussion as to why the Build Alternative being proposed has the components that are being proposed. The lack of information regarding the need for reserve median space and three continuous service drives stands out as examples of where relevant information is lacking. Without information specifying why 54.5-feet of median space are needed and why three lanes of continuous service drive (two 12-foot lanes and one 16-foot multi-use lane) are needed, questions will remain regarding what function the median space and the service drives will provide. We note that the DEIS makes several references to how the redesign of I-94 would facilitate future transit options along I-94. According to the DEIS, the reserved space in the median, continuous service drives and increased height of the bridges would all accommodate future transit use. U.S. EPA supports efforts to accommodate transit in project design wherever possible. However, it isn't clear if there will actually be a transit component to this project. Without some specific tie-in to a transit vision or plan that utilizes this corridor, it appears just as likely, or possibly more likely, that the reserved median space and the multi-use lane of the continuous service drive will be used to provide additional highway capacity.

3-7

As we have stated in our comments on the I-375 Environmental Assessment comment letter, dated February 12, 2001, we support comprehensive transportation planning for the Detroit area that includes both highway and transit components. This comprehensive planning is the only way to ensure that appropriate linkages between the systems are planned for and potential conflicts are remedied. We very much support the Transit Visioning Process for the Detroit area, which is being led by the Southeast Michigan Council of Governments (SEMCOG). We look for the visioning process to lead to viable transit projects that will benefit the region by increasing transportation choices for users and result in environmental benefits. In the case of this project, it would be prudent to not only accommodate transit scenarios involving I-94 that arise from the visioning process, but also to consider integrating transit components with highway improvements.

Since the level of service goals would be more than adequately met by implementation of the Build Alternative [LOS B,C, D would be achieved and LOS D/E is usually the goal within an urban setting], an alternative that scales down one or more of the components (mainline, service drives and/or median) might be viable. We believe there may be additional feasible alternatives that have not yet been evaluated that would meet project goals and objectives. The DEIS states that several transit alternatives (modified bus service, bus rapid transit, and light rail) were retained as compatible with a practical alternative, but eliminated as a stand-alone alternative. No evaluation was conducted of an alternative that included both highway and transit improvements. We would like to see additional build alternatives, including one with a transit component, be evaluated in more detail.

3-8

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Air Quality

Conformity Analysis - The DEIS commits to performing a Regional transportation conformity analysis following the selection of a recommended alternative. The conformity analysis should be performed before and included in the Final EIS.

3-9

Carbon Monoxide (CO) microscale analysis - The U.S. EPA has identified three types of information that needs to be included in the CO analysis write-up. The areas that require additional information disclosure are in the areas of: (1) fleet makeup, (2) background monitor, and (3) persistence factors.

3-10

The DEIS provided information on the makeup of vehicle type used in the microscale analysis. However, the DEIS did not provide information on how these values compare to those used in local area planning and the State Implementation Plan for the Detroit-Ann Arbor area. A short description how these values compare should be provided.

3-11

A key component of a Carbon Monoxide (CO) microscale analysis is the background concentration. The DEIS uses background concentrations from the Livonia air monitoring station in the analysis. This monitor is part of the U.S. EPA approved monitoring network. However, the DEIS did not include a rationale as to why data from this monitor was used to establish background concentrations.

3-12

U.S. EPA guidance calls for the use of a 0.70 default factor to estimate 8-hour concentrations from 1-hour concentrations unless local air quality monitoring data is used. A description of how MDOT derived the persistence factor equal to 0.60 should be provided.

3-13

Air Toxics work - The U.S. EPA is cosponsoring a cooperative effort between Michigan Department of Environmental Quality and Wayne County Department of the Environment, the Detroit Air Toxics Pilot Project, as part of its national air toxics monitoring program. The project is measuring levels of eighteen (18) air toxic compounds, including volatile organic compounds, semi-volatile compounds, carbonyl compounds and trace metals. There is one monitoring location that is near a high-traffic intersection, which will serve as a mobile source oriented site. The project officially started April 19, 2001. Results will be forthcoming from the project on a quarterly basis. Information about the program can be viewed at: <http://www.deq.state.mi.us/adq/eval/amu/pilot.html>. Information from this project should be referenced in subsequent NEPA documentation.

3-14

Noise

The DEIS provides little information regarding how the project would be phased in if the Build Alternative was selected for implementation. Plans for the phasing of the project may itself be the cause of significant noise and air quality issues especially if mainline traffic is detoured other local roads. The DEIS makes references to the service drives acting to reduce traffic disruption during

3-15

construction of the I-94 mainline. In the scoping document for this project, a reference is made to using the continuous service roads as detours during the construction of I-94. This would have the effect of routing a large amount of interstate traffic at the same level and just adjacent to neighborhoods that meet the definition of environmental justice communities. Noise and other impacts associated with this detour plan should be evaluated. Appropriate mitigation measures should be considered and implemented.

In the discussion of noise impacts, the DEIS discusses FHWA's June 12, 1995 revised guidance on traffic noise analysis. In that guidance, all State Highway agencies were required to adopt written noise policies according to the revised FHWA guidance with respect to cost-per-residence criteria. Those criteria were used to provide a rationale as to why noise walls were not required at two schools. Based on the information provided in the DEIS, it isn't clear if this is an appropriate use of this criteria. Subsequent NEPA documentation should address this point.

3-16

Pedestrian and Bicyclist Impacts

A statement was made on page 1-8 of the DEIS that the Build alternative will improve pedestrian access. This is difficult to objectively assess because there is little data presented in the DEIS that discusses the existing pedestrian access. The discussion on pedestrian and bicyclist access topic is limited to page 2-14. The information presented indicates that sidewalks are present along existing service drives but the service drives are not continuous. Some of the pedestrian bridges (used by both pedestrians and bicyclists) are in disrepair. The DEIS did not present information regarding the pedestrian and bicycle access needs in the area. The build alternative would combine vehicular bridges with pedestrian bridges and would eliminate stand-alone pedestrian bridges. The DEIS did not evaluate how these changes would impact pedestrian and bicycle activity in the area. Subsequent NEPA documentation should evaluate these impacts and other community impacts in more detail.

3-17

Costs

Cost information is presented in the DEIS in a Table entitled "I-94 Rehabilitation Project Cost Estimates" on page 4-38. The table provides estimated costs for alternatives broken down by construction, right-of-way, design and construction engineering and total. There is little substantiation provided with these estimates. Without providing additional information to support the numbers shown in the table, it is difficult for the reader to compare alternatives on a very important variable. At no place in the DEIS was the matter of maintenance costs discussed. The project being evaluated in this DEIS represents a large investment in highway infrastructure. It would be important to know whether there were significant differences in maintenance costs between the studied alternatives. We recommend that this type of information be included.

3-18

Cumulative Impacts

The DEIS includes a section on cumulative impacts starting on page 5-94. The section lists a number of transportation projects that were recently completed or included in the SEMCOG's Transportation Improvement Program (TIP) and the MDOT Five Year Road and Bridge Program. The impacts associated with these projects all appear to be important to include in an cumulative impact analysis. The DEIS does not really include any evidence that a cumulative impact analysis looking at both benefits and adverse impacts was conducted. The cumulative impact section is written as a subjective summary. No analysis has been provided to support the claim that noise, visual quality, economy and pedestrian mobility would be improved or that the cumulative beneficial impacts to the economy and social environment would far exceed the adverse impacts.

Other projects on I-94 and other transportation projects in the area and their impacts should be included in an analysis in the DEIS. Resources and impacts of particular concern to U.S. EPA include: Air Quality, Noise, Impacts to Environmental Justice communities, and land use changes.

3-19

PR Region 5 DSEA ID:312-353-5374 MAY 11 11:01 14:11 No.008 P.09

SUMMARY OF RATING DEFINITIONS AND FOLLOWUP ACTIONS*

ENVIRONMENTAL IMPACT OF THE ACTION

LO—Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1—Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

**From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment.*

MAY 11 01 14:11 No.008 P.10

ID:312-353-S374

SEPA Region 5 USEA

Response 3-1

The U.S. EPA letter contains a description of the project and indicated their detailed comments were contained in the attachments to the letter. The responses to the concerns identified in the attachments are provided by Responses 3-2 through 3-19.

Response 3-2

The Federal Highway Administration (FHWA) regulations at Title 23 Code of Federal Regulations (CFR) Part 771.111(f) outline three general principles that are to be used to frame a highway project:

1. Connect logical termini and be of sufficient length to address environmental matters on a broad scope;
2. Have independent utility or independent significance; i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and
3. Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

Section 2.3 in this FEIS discusses how the proposed project addresses the requirements stated above. *Traffic Report Volume 3: Simulation of Year 2025 Conditions, August 2002* provides a detailed explanation of how the project meets the requirements for logical termini from a traffic standpoint. The logical termini of this project are rational end points for a transportation improvement and rational end points for a review of the environmental impacts. The western terminus, the I-96 interchange with I-94, is a key interchange by which traffic from the Ambassador Bridge accesses I-94 and by which traffic from I-75 and I-94 accesses I-96. The I-96 interchange with I-94 is a modern interchange, providing acceptable operations. Based upon traffic studies and from the standpoint of system connectivity, the I-96 interchange is a logical western terminus for the project. The eastern terminus, Conner Avenue, is an important local road and the foremost north-south arterial road connecting major east-west facilities on the east side of Detroit. Conner Avenue is also the main access road between I-94 and Detroit City Airport.

Since the DEIS, rehabilitation of I-94 has occurred east of Conner Avenue and west of the I-96/I-94 interchange. In 2002, I-94 from east of Conner Avenue to Masonic Boulevard (a distance of approximately 12 miles) underwent major rehabilitation, including, repairing and resurfacing the pavement and rehabilitating or replacing 51 bridges. Capacity improvements were not part of the project as they were not deemed to be needed. West of I-96, a maintenance project to resurface the roadway from Wyoming Avenue to I-96 occurred in 2003, and several bridges were repaired or replaced. All eastbound trucks over 13.5 feet high are still directed to exit at Wyoming Avenue because numerous overpasses east of Wyoming Avenue provide less than the current standard of 14.5 feet in vertical clearance. As a result of the two improvement projects east of Conner and west of I-96, combined with the vertical clearance restrictions, the logical termini for this project are from I-96 to Conner Avenue.

Time space maps of the corridor displaying average travel speeds using 1995 traffic volumes for the AM and PM peak periods show predominant speeds of 30 mph throughout the project area although posted at 55 mph, indicating severe traffic congestion. The lower speeds extend from west of the I-96 interchange to the Conner Avenue interchange. The congestion and lower speeds appear to be a result of the existing major interchanges between I-94 and I-96 and also

I-94 and I-75. Traffic analysis for 2025 indicates that volumes drop east of Conner Avenue, but are still at the Level of Service (LOS) E. Through the project area, level of service and flow is expected to be acceptable. West of the I-94/I-96 interchange, the LOS is F; however, that is not a result of the proposed improvements. The traffic congestion west of I-96 is more a result of traffic coming from and going to I-96. Immediate action east and west of the proposed termini is not needed due to the updates in the last few years. Addressing the problems that exist within the proposed project termini will address major known issues with a solution that will be compatible with future projects.

In view of the above discussion, I-96 and Conner Avenue are logical termini. The project termini define a 6.7 mile stretch of freeway that as discussed in FEIS Section 2.3, is a critical segment of I-94 and in the greatest need of rehabilitation.

As described in FEIS Section 2.3, the proposed reconstruction of the project corridor would be of independent utility and significance and a reasonable expenditure, even if no additional transportation improvements to adjacent sections of I-94 are made.

As described in FEIS Section 2.6, the Recommended Alternative proposes improvements to the corridor in a manner consistent with the applicable regional and local government plans and does not restrict consideration of other reasonably foreseeable transportation improvements.

Response 3-3

The MDOT and FHWA have supported the project limits and logical termini based on supporting information. The Federal Highway Administration (FHWA) regulations at Title 23 Code of Federal Regulations (CFR) Part 771.111(f) outline three general principles that are to be used to frame a highway project:

1. Connect logical termini and be of sufficient length to address environmental matters on a broad scope;
2. Have independent utility or independent significance; i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and
3. Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

Section 2.3 in this FEIS discusses how the proposed project addresses the requirements stated above. *Traffic Report Volume 3: Simulation of Year 2025 Conditions, August 2002* provides a detailed explanation of how the project meets the requirements for logical termini from a traffic standpoint. The logical termini of this project are rational end points for a transportation improvement and rational end points for a review of the environmental impacts. The western terminus, the I-96 interchange with I-94, is a key interchange by which traffic from the Ambassador Bridge accesses I-94 and by which traffic from I-75 and I-94 accesses I-96. The I-96 interchange with I-94 is a modern interchange, providing acceptable operations. Based upon traffic studies and from the standpoint of system connectivity, the I-96 interchange is a logical western terminus for the project. The eastern terminus, Conner Avenue, is an important local road and the foremost north-south arterial road connecting major east-west facilities on the east side of Detroit. Conner Avenue is also the main access road between I-94 and Detroit City Airport.

Since the DEIS, rehabilitation of I-94 has occurred east of Conner Avenue and west of the I-96/I-94 interchange. In 2002, I-94 from east of Conner Avenue to Masonic Boulevard (a distance of approximately 12 miles) underwent major rehabilitation, including, repairing and resurfacing the pavement and rehabilitating or replacing 51 bridges. Capacity improvements were not part of the project as they were not deemed to be needed. West of I-96, a maintenance project to resurface the roadway from Wyoming Avenue to I-96 occurred in 2003, and several bridges were repaired or replaced. All eastbound trucks over 13.5 feet high are still directed to exit at Wyoming Avenue because numerous overpasses east of Wyoming Avenue provide less than the current standard of 14.5 feet in vertical clearance. As a result of the two improvement projects east of Conner and west of I-96, combined with the vertical clearance restrictions, the logical termini for this project are from I-96 to Conner Avenue.

Response 3-4

The DEIS utilized the SEMCOG 2020 TRANPLAN model which included a truck model. The 2020 TRANPLAN model also included the external station of the Ambassador Bridge, which distributes traffic to the Detroit area freeways, including I-94. However, since publication of the DEIS, SEMCOG has released year 2000 and 2025 travel demand forecasting models for Southeast Michigan that include an enhanced commercial vehicle model. This model accounts for commercial vehicle growth at international border crossings and growth attributed specifically to NAFTA. The North American Free Trade Agreement (NAFTA) and the strong economy from 1996 to 1999 contributed to the 31 percent growth in cross-border truck traffic at the Southeast Michigan border crossings. This means substantial freight movement on the southeast Michigan freeways connecting to the border and along the freeway system connecting to the commercial vehicle's destinations. The long term historic growth rates of trucks across the Ambassador and Blue Water Bridges are between six- to nine-percent compounded. According to the Bi-National Border Crossing Study, truck traffic across the border is forecasted to grow at a 2.67-percent compound annual rate through 2030.

The traffic analysis for the Recommended Alternative (*Traffic Report Volume 3: Simulation of Year 2025 Conditions, August 2002*) incorporated this commercial vehicle model in its analysis of the corridor and Chapter 2 of this FEIS provides an expanded discussion of commercial vehicle traffic in the project area.

Response 3-5

Chapter 2 of this FEIS includes an expanded discussion of freight traffic within the project limits. The long term historic growth rates of trucks across the Ambassador and Blue Water Bridges are between six- to nine-percent compounded. According to the Bi-National Border Crossing Study, truck traffic across the border is forecasted to grow at a 2.67-percent compound annual rate through 2030.

The MDOT is preparing an Environmental Impact Statement to evaluate potential expansion of the Detroit Intermodal Freight Terminal (DIFT) facility to accommodate an increase of rail-truck transfers. Several alternatives are being evaluated in southwest Detroit, including improving the existing facility at the junction of the Norfolk Southern Railroad and the CSX rail lines. The *Traffic Report Volume 3: Simulation of Year 2025 Conditions, August 2002* also includes coordination of traffic volumes from the intermodal freight terminal that were utilized in the 2025 traffic projections for this FEIS.

Response 3-6

Subsequent to the DEIS being circulated, SEMCOG, the Metropolitan Planning Organization (MPO) for the Detroit urbanized area, issued a report entitled *Improving Transit in Southeast Michigan: A Framework for Action, October 2001*; the report which identified a 12-corridor, 259-mile, transit system for the Detroit area. The I-94 corridor was not included in that system. No traffic projections were performed by SEMCOG for their transit report. Even though transit was not recommended for the corridor, coordination occurred with DDOT and SMART to identify current and potential bus routes and begin the process of selecting appropriate features for accommodating bus service in the project area.

Since HOV lanes could not be studied solely within the confines of the project termini, a southeast Michigan HOV study was conducted for the seven-county region. The study (*Southeast Michigan High-Occupancy Vehicle Feasibility Study, 1999*) was documented in a separate report submitted to the MDOT on May 7, 1999. The HOV study did identify two Interstate highway segments in Southeast Michigan as meeting the criteria for consideration of HOV lanes: I-75 northbound and southbound from I-696 to M-59, and I-96 eastbound and westbound from US-23 to I-696. The I-94 study area addressed in this FEIS was not identified as having good potential for HOV due to the threshold of traffic volumes identified to be needed to make HOV feasible.

Response 3-7

An extensive public involvement and coordination process was used in this study and in the development of the DEIS Build Alternative. This alternative responded to public and agency demand for a transit component within the corridor; however, because a transit vision for the Detroit metropolitan area was not yet in place, it did not fit into a more comprehensive transportation planning scheme and no specific transit component was identified. On Oct. 25, 2001, SEMCOG adopted a regional transit plan entitled *Improving Transit in Southeast Michigan: A Framework for Action* as an illustrative element in the 2025 RTP. I-94 was not included as a transit corridor for rail or high-speed buses in the 12-corridor, 259-mile system that was described in the report. As a result, the reserved space in the median for future transit has not received the same level of support that it did prior to the release of this SEMCOG report. As described in FEIS Section 4.4, the Recommended Alternative no longer includes a reserved space in the median for future transit or a wider third lane on the service drives for multi-use. The Recommended Alternative will allow for transit in a manner consistent with applicable local plans for transit, should they be developed.

Response 3-8

The levels of service for the freeway mainline are anticipated to operate at Level of Service E or better for the I-94 mainline in the peak hours of the weekdays.

Following the DEIS Public Hearing, held March 5-6, 2001, and receipt of public and agency comments on the DEIS, three modifications to the DEIS Build Alternative were developed to respond to the comments received. All three modifications to the DEIS Build Alternative scaled down one or more components (service drives and/or median space) of the DEIS Build Alternative, and combined with the DEIS Build Alternative, offered all possible combinations of medians with and without reserved space, and two and three lane service drives. Adoption of the SEMCOG transit plan *Improving Transit in Southeast Michigan: A Framework for Action*, as

mentioned above in Responses 3-6 and 3-7, reduced need to include a reserved space in the median. There is no bus rapid transit or rail alternatives proposed in the SEMCOG plan in the I-94 corridor and none were identified to attract enough riders in this FEIS analysis either.

The Recommended Alternative for the corridor, described in FEIS Section 4.5, reduces the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each one-way service drive from the DEIS Build Alternative). The Recommended Alternative also eliminates the reserved space in the median, reducing the median width to approximately 38 feet (two 14-foot shoulders and a 6- to 10-foot area for a concrete barrier). However, since there is still strong community support for a transit system in southeast Michigan, coordination with transit providers will continue to accommodate and encourage transit use in the future.

Response 3-9

The air quality conformance analysis was conducted before completion of this FEIS. SEMCOG's regional analysis performed for the TIP incorporated the effects of this project and satisfied the regional requirements set forth in the Final Conformity Rule. The SEMCOG conformity analysis was submitted and approved by the U.S. Environmental Protection Agency (EPA). For the year 2025, the Recommended Alternative CO levels are higher than the No-Build Alternative CO levels at all of the sites analyzed. These sites were chosen to demonstrate the worst-case impact the project is expected to have on local air quality levels. Though the Recommended Alternative levels are higher than the No-Build Alternative, all predicted concentrations are below applicable federal and state standards. The project is not predicted to cause or exacerbate a violation of the CO standards. Further discussion of the air quality analysis results is contained in Chapter 5.

Response 3-10

The Carbon Monoxide (CO) microscale analysis contained in FEIS Section 5.5 has been updated for the year 2025 and includes additional information concerning the areas of fleet makeup, background monitor, and persistence factors.

Response 3-11

Section 5.5 has been updated to include a short description of how the makeup of vehicle types used in the microscale analysis compares to those used in the local planning area and the State Implementation Plan for the Detroit–Ann Arbor area.

Response 3-12

The DEIS air quality analysis utilized the Livonia monitoring station due to malfunctions at monitoring sites located in closer proximity to the corridor. The Air Quality analysis conducted for the Recommended Alternative utilized the Linwood monitoring station, which is located in the city of Detroit and within the project corridor. Refer to FEIS Section 5.5. The air quality analysis included in this FEIS explains the rationale for selection of an air quality monitoring station for use in the analysis.

Response 3-13

The 0.70 default factor is used for the Recommended Alternative as suggested. Derivation of the persistence factor is discussed in FEIS Section 5.5.

Response 3-14

The pilot project is intended to generate information on the spatial and temporal variability of ambient air toxics concentrations and will be used to design a national ambient air monitoring network.

Information regarding this project can be found at <http://www.deq.state.mi.us/dat/#sites>.

Analysis of the data collected is ongoing. Ladco (www.ladco.org) is collecting, analyzing and summarizing the data collected. The DEQ plans to release a draft document discussing risk assessment based on the monitored data in December of 2004. At least two of the monitoring sites focused on emissions from mobile sources. Once the data analysis of the study is complete, it is hoped that the relationship between mobile sources and air toxics will be better understood.

Response 3-15

The mainline traffic will not be detoured to the service drives. Building the continuous service drives prior to the construction of the mainline will support local traffic needs during mainline construction. Traffic impacts will be influenced by the construction phasing for the project, which will not be finalized until the succession of project funding is secured and detailed construction and traffic management plans are prepared. FEIS Section 7.13 provides a preliminary plan for the accommodation of traffic during construction. The mitigation measures to reduce construction impacts related to air and noise are described in FEIS Sections 7.15 and 7.16.

Response 3-16

This FEIS updates the noise analysis to the year 2025. In the updated analysis, the cost-per-residence criteria are not used to evaluate noise barriers for locations such as schools or churches. These non-residential uses were evaluated under the FHWA Category E. Receptor sites R8, R19, and R29 (shown in Figures 5-11A and B) are all educational institutions and are evaluated under the FHWA Category E designation. Category “E” land uses, as defined in Table 5-16, are those activities which apply for interior spaces, such as schools, churches, libraries, hospitals, auditoriums, and public meeting rooms. The FHWA Category “E” impact approach level is 51 dBA. In accordance with the MDOT, guidelines, estimated interior noise levels with closed window conditions yields a 25-decibel noise reduction. Interior noise levels at all three locations are below the impact threshold. Refer to FEIS Section 5.6 for a description of all criteria used in the updated noise analysis.

Response 3-17

Section 5.1.2.3 contains additional information regarding pedestrian and bicyclist access needs and safety requirements within the corridor and how the Recommended Alternative addresses these needs. Construction of the Recommended Alternative would result in the removal of two pedestrian-only bridges, leaving six remaining pedestrian-only bridges. The first removal is the Brooklyn Street pedestrian bridge over I-94, located between Trumbull Street and M-10. The second removal is the Canfield Avenue pedestrian bridge, located south of I-94 and Forest Avenue. All other pedestrian-only bridges are being replaced in their current locations or within one block.

Nine combined existing vehicular/pedestrian bridges also would be removed (seven over I-94 and two over I-75). The loss of the nine combined vehicular/pedestrian bridges would result in longer walking distances; however, this increased distance often is only one additional block and never greater than three blocks.

The provision of continuous service drives with sidewalks for the Recommended Alternative would have a positive overall impact on pedestrians, providing improved east/west connectivity north and south of I-94. In addition, the improved vehicular bridges with sidewalks would provide additional, safer pedestrian crossings across I-94. Residents would have an improved capability to walk and ride their bikes in high-density residential and neighborhood commercial areas that would be more accessible via sidewalks and pedestrian bridges.

The removal/consolidation of some of the pedestrian bridges are shown in Figures 5-8A and B. FEIS Section 5.1.4 describes the Environmental Justice implications of the Recommended Alternative to pedestrian and bicycle access within the corridor. The MDOT coordination with citizens and pedestrian and bicycle experts will be ongoing during the design phase of this project.

Response 3-18

Cost information for the No-Build, Build Alternative, and the Recommended Alternative is presented in FEIS Section 4.7. The No-Build Alternative will require maintenance due to the aging freeway infrastructure. The maintenance cost of this alternative could include replacement of all bridges and pavement that have exceeded their design life. The Enhanced No-Build Alternative proposes planned but limited improvements to the existing freeway. As such, new bridges, pavement, and existing freeway elements will require maintenance; however, there will be no additional lanes to maintain. The DEIS Build Alternative and Modifications One, Two, and Three all provide organized efforts to reconstruct the entire corridor. New pavement, bridges, drainage, and additional lanes will figure into the maintenance cost of each alternative. The Build Alternative and modifications propose four through lanes along the mainline of I-94 and continuous service drives for the length of the project; the primary difference among the alternatives is in the retention or elimination of reserved median space and lanes along the service drives. A further factor influencing the maintenance cost of the Build Alternative and modifications will be the decision to include specific mitigation and enhancement treatments.

Response 3-19

Section 5.15 contains an updated Indirect (Secondary) and Cumulative Impacts Analysis for the Recommended Alternative which is based on the methodology contained in the Maryland State Highway Administration's Secondary and Cumulative Effects Analysis Guidelines for EISs and EAs. The Maryland guidelines have been widely recognized as meeting all requirements. As part of the preparation of this FEIS, a project-specific methodology based on Maryland guidelines was submitted to the regional Environmental Protection Agency office and coordination meetings were held to obtain approval of how the analysis would be updated for this FEIS. The updated cumulative impacts analysis consists of a more in-depth analysis than that presented in the DEIS, using other projects in the vicinity of I-94 and looking at the combined benefits and adverse effects of these projects. Air quality, noise impacts, and land use changes are each addressed.

Letter 4: Southeast Michigan Council of Governments (SEMCOG)

SEMCOG . . . Local Governments Advancing Southeast Michigan

Southeast Michigan Council of Governments • 535 Griswold Street • Suite 300 • Detroit, Michigan 48226 • 313-961-4266 • Fax 313-961-4866
http://www.semco.org

April 2, 2001

Ronald S. Kinney, Manager
Michigan Department of Transportation
Project Planning Division/Environmental Section
P.O. Box 30050
Lansing, Michigan 48909

RE: Draft Environmental Impact Statement (DEIS) from the U.S. Department of Transportation/Federal Highway Administration for a project entitled "I-94 Freeway Rehabilitation Project, East of I-96 to Conner Avenue, Detroit, Wayne County, Michigan"
Regional Clearinghouse Code: TR 010033

Dear Mr. Kinney:

SEMCOG, the Southeast Michigan Council of Governments, has processed a review for the above Draft EIS according to intergovernmental review procedures established in NEPA and Federal agency guidelines

As the designated regional planning agency for Southeast Michigan, we notified the following local government agencies of your project:

Wayne County Planning Division
Detroit Planning & Development Department
Suburban Mobility Authority for Regional Transportation

As of this date, no comments have been received. We will forward comments, if any, for your information and attention.

SEMCOG's staff has reviewed the Draft EIS which you submitted and offers attached comments from our Transportation Program staff (C. Palombo 3/30/2001) and Environmental Program staff (B. Parkus 3/6/2001).

We look forward to your response and the Final EIS when it is completed.

Sincerely,



Richard W. Pfaff, Jr.
Regional Review Coordinator

RWP/bar

Attachments

Marjorie Thomas
Chairperson
President, ISD of
St. Clair County
Board of Education

Dante J. Lanzetta, Jr.
First Vice Chairperson
Commissioner
City of Birmingham

Donald E. Dodge
Vice Chairperson
Commissioner
St. Clair County

R. LaMar Frederick
Vice Chairperson
Supervisor
Bedford Township

Maryann Mahaffey
Vice Chairperson
Council President Pro Tem
City of Detroit

Diana J. Kalakowski
Immediate Past Chair
Commissioner
Macomb County
Board of Commissioners

Paul E. Tait
Executive Director
Recycled paper

4-1

SEMCOG

MEMO

Southeast Michigan Council of Governments
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(313) 961-4266
Fax (313) 961-4869
<http://www.semcog.org/>

March 6, 2001

TO: Rich Pfaff, Jr.

FROM: Bill Parkus

SUBJECT: Draft Environmental Impact Statement, I-94 Freeway Rehabilitation Project
Regional Clearinghouse Code: TR 010033
Michigan Department of Transportation

SEMCOG staff has reviewed the above referenced Draft Environmental Impact Statement and finds it to be consistent with the *Water Quality Management Plan for Southeast Michigan*. In general, no impacts from storm water are expected. Storm water is conveyed from the expressway in Detroit's combined-sewers for treatment at the wastewater treatment plant, then released to the Detroit River. However, Thirty contaminated sites could potentially impact the project. At contaminated sites in which the soil will likely be disturbed due to construction, sewer manholes and catch basins should be protected from contaminated runoff to the extent possible. Thus, a permit under Part 91 (Soil Erosion and Sedimentation Control) of P.A. 451 of 1994, the Natural Resources and Environmental Protection Act, may be required.

4-2

SEMCOG**MEMO**

Southeast Michigan Council of Governments
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March 30, 2001

TO: Rich Pfaff

FROM: Carmine Palombo

SUBJECT: I-94 Draft Environmental Impact Statement & Section 4(f) Evaluation

The Transportation Department has reviewed the *I-94 Draft Environmental Impact Statement & Section 4(f) Evaluation* and offers the following comments.

General comments

The I-94 corridor is a valuable transportation asset in Southeast Michigan. We support the efforts of the Michigan Department of Transportation to rehabilitate the corridor from I-96 to Conner Avenue in the City of Detroit, thereby improving freeway capacity, safety, and pavement conditions as well as local traffic circulation. The I-94 Rehabilitation Project is listed as a study in the *2025 Regional Transportation Plan for Southeast Michigan* (2025 RTP). The project is clearly consistent with 2025 RTP goals and we anticipate the movement of this study to the next phases of design and construction.

4-3

Evaluation Summary

- 6.6 Air Quality (page 15) — The project is in the current RTP and TIP as a study only and has not been modeled for air quality conformity. The entire project must be in a conforming RTP and at least one phase of the project in the TIP, including funding sources, and FHWA and FTA must issue a finding of conformity before the Record of Decision can be submitted for approval.

4-4

Draft Environmental Impact Statement and Section 4(f) Evaluation

- 2.2 Project Background (page 2-4) — The I-94 study is also listed in the 2025 RTP.
- 2.5.6 Transit, Pedestrians, and Bicyclists (page 2-14) — It is not enough to suppose the new service drives will provide "opportunities for improved transit." MDOT should commit to working with DDOT and SMART to enhance transit service in and through the area. Are routes along the service drives likely to be added? Have the transit agencies been involved during development of the Preferred Alternative? Are there plans and committed funding sources for amenities, including shelters along the service drives to protect transit users from increased traffic, etc.? (This represents a potential environmental justice issue.)

4-5

4-6

- 4.5.2 Transit (page 4-22) — The 2025 RTP calls for investing \$5.5 billion in transit, not more than \$6 billion as the text currently reads. 4-7
- 4.7.1 Goal 1 - Mobility (page 4-34) — With respect to analyzing the Recommended Alternative for commercial traffic, SEMCOG's commercial vehicle model is tentatively scheduled to be available in January 2002. If that time line corresponds to the analysis of the Recommended Alternative, it can be used for evaluation purposes. 4-8
- 5.1.1.4 Non-Motorized Mobility (page 5-15) — While SEMCOG agrees the addition of continuous service drives with sidewalks and sidewalks on vehicular bridges over the freeway should enhance non-motorized access, specific attention should continue to be paid to this issue. In particular, the safety of pedestrians and bicyclists along and across the service drives and bridges is a concern. Pedestrian facilities must be more than just sidewalks; they must consist of properly designed walkways, accessible and properly placed crosswalks, etc. Also of concern is the removal/consolidation of some pedestrian bridges. The report states that the high percentage of households without autos increases citizen reliance on non-motorized travel and transit travel (which also requires pedestrian access to transit stops). Therefore, any plans to modify non-motorized access along and across the freeway should be carefully scrutinized with respect to the impacts on local citizens and community connectivity and should be subject to review by the citizens. An organized meeting of the consultants, citizens, non-motorized experts, and MDOT is also recommended during the design phase. 4-9
- 5.1.5 Environmental Justice (page 5-23) — USDOT and FHWA do not specifically outline how environmental justice analyses should be performed. SEMCOG is working with FHWA to develop appropriate regional analysis tools, which may be used to analyze this project upon submittal for inclusion in the RTP and TIP. 4-10
- 5.1.5.2 Actions to Address Disproportionately High and Adverse Effects (page 5-26) — A toll-free number for comments/complaints does not seem sufficient. Is there an approachable project office located in the area for residents to access information and convey complaints and concerns during construction? 4-11
- 5.5.3.2 Attainment Status of the Project Area (page 5-49) — Southeast Michigan is a maintenance area for 1-hour ozone, not an attainment area as the text currently reads. 4-12
- 5.2 Economic Environment
 - The text states that the build alternative would displace five businesses (page 5-31) but also references Table 5-7 (page 5-18) which indicates 15 business structure displacements. Do the five businesses occupy multiple structures? Please clarify. 4-13
 - It is acknowledged that businesses relocated some distance away from their original locations would have to reestablish a customer base and could lose money temporarily. Non-displaced businesses could also experience temporary losses during construction. It is suggested that mitigation expand beyond relocation assistance. (This represents a potential environmental justice issue.) For example:
 - a special fund could be set up to cover interim operating losses to sustain businesses during construction, 4-14

- focused assistance could be offered to help business owners take full advantage of empowerment and renaissance zones where they exist, and
 - incentives could be offered for businesses to relocate in the same general area to continue serving the community (the report notes that Segment B particularly depends on corner stores for basic shopping).
-
- 5.11.2.1 Existing Historic Resources (page 5-80) — The text states that 15 additional buildings must be surveyed to determine NRHP eligibility. Why were these structures not surveyed prior to issuing the DEIS? If they are found to be eligible, how will that impact the continuation of the project?

4-15

Response 4-1

Comment acknowledged.

Response 4-2

A Storm Water Pollution Prevention Plan will be prepared noting appropriate soil erosion control measures. The presence of contaminated soil will be considered in preparing that plan. The soil erosion and sediment control plan on file with the Michigan Department of Environmental Quality requires the placement of appropriate control measures and routine inspections of those measures to assure their continuing effectiveness. The *MDOT Soil Erosion and Sedimentation Control Manual*, 2000, contains guidance relating to the selection and implementation of appropriate erosion control measures for various circumstances and will be used to design the erosion control measures for this project. No soil erosion and sedimentation control permits for the project will be required due to the MDOT's authorized public agency status. See Section 7.2 of this FEIS.

Response 4-3

Comment acknowledged.

Response 4-4

These requirements are noted and the necessary actions will be taken prior to submitting the Record of Decision for approval.

Response 4-5

Section 2.2 has been updated to note that the I-94 Rehabilitation Project is now listed in the 2025 RTP.

Response 4-6

Coordination with DDOT and SMART has been ongoing throughout the selection of the Recommended Alternative for the project corridor. Both agencies support the proposed design, interest in utilizing the continuous service drives to expand bus service within the corridor, and willingness to continue communication with the MDOT regarding specific service-related requirements. The MDOT is committed to working with these agencies and will continue to coordinate with them to ensure that enhanced transit services are met. Specific locations for bus stops and other amenities will be determined during the design phase of the project. As part of the project cost there may be funding available to transit to mitigate the construction impacts.

Response 4-7

The comment is noted. There is no reference in this FEIS to the dollars allocated to transit in the 2025 RTP.

Response 4-8

The SEMCOG commercial vehicle model became available and was used to evaluate the Recommended Alternative. The traffic analysis for the Recommended Alternative (*Traffic Report Volume 3: Simulation of Year 2025 Conditions, August 2002*) incorporated this commercial vehicle model in its analysis of the corridor and Chapter 2 of this FEIS provides an expanded discussion of commercial vehicle traffic in the project area.

Response 4-9

Section 5.1.2.3 contains additional information regarding pedestrian and bicyclist access needs and safety requirements within the corridor and how the Recommended Alternative addresses these needs. Construction of the Recommended Alternative would result in the removal of two pedestrian-only bridges, leaving six remaining pedestrian-only bridges. The first removal is the Brooklyn Street pedestrian bridge over I-94, located between Trumbull Street and M-10. The second removal is the Canfield Avenue pedestrian bridge, located south of I-94 and Forest Avenue. All other pedestrian-only bridges are being replaced in their current locations or within one block.

Nine combined existing vehicular/pedestrian bridges also would be removed (seven over I-94 and two over I-75). The loss of the nine combined vehicular/pedestrian bridges would result in longer walking distances; however, this increased distance often is only one additional block and never greater than three blocks.

The provision of continuous service drives with sidewalks for the Recommended Alternative would have a positive overall impact on pedestrians, providing improved east/west connectivity north and south of I-94. In addition, the improved vehicular bridges with sidewalks would provide additional, safer pedestrian crossings across I-94. Residents would have an improved capability to walk and ride their bikes in high-density residential and neighborhood commercial areas that would be more accessible via sidewalks and pedestrian bridges.

The removal/consolidation of some of the pedestrian bridges is addressed in FEIS Section 5.1.2. The city of Detroit has been involved in determining pedestrian crossing locations and will have the opportunity to review all proposed pedestrian crossings during the design phase of this project. Additionally, continued public involvement through the design phase of this project will be used to obtain feedback on pedestrian access within the corridor.

Response 4-10

The Environmental Justice Analysis presented in FEIS Section 5.1.4 of this FEIS utilized the developed MDOT guidelines. The outline for the analysis was reviewed and approved by the EPA.

Response 4-11

As part of the planning phase of this project, MDOT maintained a project office in the city of Detroit. A project office and/or the Detroit TSC will be available for residents to access information and convey comments during the construction phase of the project.

Response 4-12

Section 5.5.3.2 has been updated to reflect the latest USEPA air quality attainment status for southeast Michigan.

Response 4-13

The Recommended Alternative is expected to impact 12 commercial structures. The commercial businesses include two bars, a 24-unit motel, two fast-food restaurants, a recording studio, an automotive service center, a storage unit, truck sales, a development center, a strip retail development, and a vacant building. All information regarding the estimated commercial and residential displacements has been updated for this FEIS based on the MDOT's selection of the

Recommended Alternative. This information is contained in FEIS Section 5.1.2 and in the Conceptual Stage Relocation Plan in Appendix C.

Response 4-14


Section 5.2.3 identifies some of the mitigation measures that will assist businesses displaced by the Recommended Alternative. The MDOT Real Estate will coordinate with business owners regarding the acquisition of specific properties in a manner consistent with applicable legal standards and MDOT procedures.

No special fund can be set up to cover interim operating losses to sustain businesses during construction.

Response 4-15

These fifteen structures were not surveyed prior to the DEIS because they were not discovered in time. The structures were surveyed for this FEIS. Of the additional structures surveyed, the Square D/Detroit Fuse and Manufacturing Company Building was determined eligible for listing on the National Register of Historic Places. Research on the Square D/Detroit and Fuse Manufacturing Company Building was submitted to the SHPO and a concurrence letter was signed on August 4, 2004 stating the building is eligible for the NRHP. As described in FEIS Section 6.5.4, the original, three-story Detroit Fuse and Manufacturing Company Building, designed by the architect Albert Kahn, is significant for its historical associations with both Square D and the 1954 strike. Demolition of the Square D/Detroit Fuse and Manufacturing Company Building would be an adverse effect. As part of the mitigation effort to preserve record of this site, the building will be recorded to SHPO standards and an exhibit will be developed with the SHPO detailing the 1954 Square D strike. In addition to the Square D/Detroit Fuse and Manufacturing Company Building, there are three other impacts to historic resources. The Recommended Alternative will use property from one historic district (the Woodbridge Neighborhood Historic District) listed on the NRHP and three properties that are eligible for listing on the NRHP: the I-94/M-10 interchange, the United Sound Systems Recording Studios, and the Square D/Detroit Fuse and Manufacturing Company Building. The properties are discussed in detail in the DEIS and FEIS Section 5.11 Cultural Resources. Mitigation measures are described in detail in the MOU contained in Appendix E.

Letter 5: City of Detroit, Planning and Development Department

 CITY OF DETROIT PLANNING AND DEVELOPMENT DEPARTMENT	2300 CADILLAC TOWER DETROIT, MICHIGAN 48226 PHONE 313-224-6380 FAX 313-224-1629 WWW.CIDETROIT.MI.US
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May 11, 2001


Jose A. Lopez, Public Hearing Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

DELIVERED VIA EMAIL & FAX

RE: I-94 Rehabilitation Project (DEIS) Draft Environmental Impact Statement

Attached are my comments for the City of Detroit, Planning and Development Department, regarding the referenced subject. I have also included a map of development projects along the I-94 corridor.

Sincerely



Donald-Ray Smith
Principal City Planner

drs/DRS

cc: S. Green (DPW)
A. Nwankwo (Parsons Brinckerhoff)

DENNIS W. ARTHUR, MAYOR

003

May 10, 2001

Donald-Ray Smith
Principal City Planner

City of Detroit
Planning and Development Department (P&DD)
Planning Division

I-94 Rehabilitation Project DEIS (Draft Environmental Impact Statement)

Comments concerning the Build Alternative

It is vital to the City of Detroit that I-94 continues to provide a safe and effective means of transportation to the community, the City of Detroit and the region well into the 21-century. It is clear that the Interagency Coordination Committee (the "ICC") has continued to challenge MDOT's consultants to develop alternatives that do not impact the communities adjacent to I-94, but still meets the growing demand the region has on the interstate system.

Review of the alternatives suggests that the Build Alternative will give the City of Detroit and the region increased flexibility to meet the transportation challenges it will face in the coming decades. The Build Alternative has several long-range benefits included in the proposed design. They are as follows:

- Improvements to the I-94/M-10 and I-94/I-75 interchanges,
- Inclusion of right-of-way for a transit option, still to be determined,
- Removal of all the left-hand exit ramps,
- Additional lanes for increased capacity,
- Separation of local and through traffic, and
- Increased accessibility and aesthetics

However, the report identifies several impacts the proposed Build Alternative would have on the community and the City of Detroit. These impacts can be mitigated as the project moves forward in the final design phase of the project. Discussion and development of acceptable mitigation measures and alternatives that are compatible with the Build Alternative should be continued with the public, the City of Detroit (and its departments) and the ICC. Identified below are impacts caused by the proposed Build Alternative and compatible alternatives, requiring further discussion:

1. **Transportation Systems Management** – The inclusion of Transportation Systems Management (TSM) can exponentially increase the usefulness, safety and longevity of the Recommended Alternative. Installation of the hardware for TSM, specifically, Intelligent Transportation Systems (ITS), should be completed during the construction of the alternative.
2. **Transit Options** – The Build Alternative includes a transit option, which is a great benefit to the region

5-1

5-2

Comments concerning the Build Alternative (continued)

Page 2 of 5

and community. Light Rail, Bus Rapid Transit and other options can be included in the design in the future. It would be beneficial to identify and understand any limitations the construction of the right-of-way for the transit option has on the operation, funding or ownership of a future transit system.

5-3

3. **Mainline Design Speed** – The design, posted and desired speed of commuters can be difficult to forecast and control. The design of Interstate 696 and current speed limit enforcement issues are an example of this issue. Speed also affects the desired speed of commuters on adjacent service drives, noise levels adjacent to the interstate and the severity of accidents. The design speed of the Recommended Alternative should be evaluated (reduced) to limit the disadvantages associated with over-designing the alternative.

5-4

4. **Continuous Service Drive** – There are several concerns with the continuous service drive (the "CSD"). One of the concerns focuses on the impact the CSD would have on the adjacent residential communities. The width and limited access of the proposed CSD might promote higher commuter speeds. Resulting in the increase of noise levels and decreasing pedestrian safety. Reducing the lane width and providing signalized crosswalks could be investigated to reduce commuter speed.

The width of the multi-use lane could also be reduced temporarily, to study the effects of a narrower pavement width. Additional margin width between the curb and sidewalk could be added to enhance the pedestrian area.

5-5

Traffic access into the adjacent residential neighborhoods from the CSD could be reduced, as suggested, by cul-de-sacs and landscaped areas/walls. Maintenance, snow removal, refuse removal and law enforcement of these areas will require additional input from MDOT, Detroit Police Department and the City of Detroit, Department of Public Works (DPW).

5. **Noise Barriers** – Noise abatement measures should be provided for residents that live, work or attend schools in areas along the freeway corridor where noise barriers are not being proposed. As currently proposed noise abatement will not be provided in neighborhoods where a \$30,000 cost criteria for being reasonable and feasible is exceeded. The use of noise barriers should not be disregarded until assessments and studies can be made after the alternative is constructed.

5-6

6. **Drainage and Water Quality** – The Recommended Alternative should include storm water retention and treatment designs, during construction and in the final design. The design period of the project and the current condition of Detroit's sewerage system can not be assumed to remain "as is" for the design-life of this project. Water quality and storm water issues for the Detroit are a regional concern.

5-7

7. **Displacement of Woodbridge Historic District, United Sound Systems Recording Studios** – The impact the Build Alternative has on the Woodbridge Historic District and the United Sound Systems Recording Studio should be reviewed with continued community interest a priority.

5-8

Comments concerning the Build Alternative (continued)

Page 3 of 5

8. **Pedestrian Bridges and Pedestrian Safety** – Pedestrian safety and pedestrian access across the Build Alternative is very important to the community and can have economic effects to local businesses. Pedestrian walkways, crosswalks and bike lanes should be included into the alternative wherever possible. Aesthetics should be included into the design of the pedestrian bridges, not only for the interstate motorist but for the pedestrians. Pedestrian mobility will seriously be restricted through the elimination of current pedestrian bridges, and the inclusion of the cul-de-sac design. 5-9
9. **Traffic Impacts, DPW Facility** – Any concern DPW has regarding the impact that the alternative would have on the operation of its facility should be documented, and addressed as part of the mitigation measures. 5-10
10. **Air Quality Monitoring** – Data should be applied from monitoring stations along or near the project area. Monitoring data used in the DEIS was taken from a Livonia monitoring station. It seems reasonable that air quality would be impacted in the project area by increased traffic and congestion. 5-11

Potential improvements concerning the current DEIS

1. Explore the feasibility of scaling back the preferred "Build Alternative". There would be less displacement and construction impacts; creating funding that could be used for potential mass transit. This balanced approach is supported by the 1990 (City of Detroit) Master Plan of Policies. Policy 203-42, pp. II-77 notes: "Considering the transit system as a public utility much like electricity, gas and water . . . and . . . as an adjunct to the traffic system. Utilizing earmarked trafficway funds on the basis of transit freeing trafficway space and better management of the trafficway system." This coincides with the concept of flexible (flex) funding, which is particularly relevant for highway projects such as the I-94 rehabilitation project and its impact on future mass transit initiatives. It is also consistent with recent transportation funding legislation (ie: The Intermodal Transportation Efficiency Act (ISTEA, 1991) and The Transportation Equity Act for the 21st Century (TEA 21, 1998)). 5-12
2. It is recommended that the future center multi-modal lanes be moved to the outside (curb) lane of the service drives. Such a configuration would be pedestrian friendly, and is more accommodating for potential mass transit stations and transfers. Use of this approach may require the elimination of at least one driving lane on both the east and west service drives. A benefit is that only two lanes of through traffic, with accompanying side walks, would discourage potential speeding. The reserved multi-modal space should be sufficiently landscaped and buffered from the surrounding land uses. 5-13

<p>PROJECT NO. 2000-000 313 224 1310</p>	<p>CIT OF DET P&DD</p>	<p>006</p>
<p><u>Potential improvements concerning the current DEIS (continued)</u></p>	<p>Page 4 of 5</p>	
<p>3. The Planning Division "Urban Design Unit" requires additional plans indicating the extent of the R.O.W. (Right-of-Way) on adjacent land parcels to be absorbed by the project, so they can study the physical impact realistically.</p>		
<p>A portion of the I-94 project crosses through the lower and middle Woodward areas which is the location of Detroit's principal cultural and institutional establishments, (as well as) an important business and residential corridor. This area would benefit from an urban design that enhances the immediate and surrounding environment.</p>		<p>5-14</p>
<p>4. Recommend a special I-94 freeway R.O.W. treatment between the Lodge and I-75 freeway's to highlight its passage through the University-Cultural Center, the Art and Medical Centers at the lower Woodward area, and also to highlight its passage through the Harper-Brush residential area and the New Center Business sections in the middle Woodward area.</p>		<p>5-15</p>
<p><u>Development Projects within the project area</u></p>		
<p>The following current and proposed development projects lie within a half (1/2) mile buffer, along the I-94 Rehabilitation Project corridor:</p>		
<ul style="list-style-type: none"> West Pointe Homes (I-94 to the south, Epworth to the west, Tireman to the north and Beechwood to the east) - scattered site of residential homes (approx. 60 units) 		
<ul style="list-style-type: none"> Thyssen Steel - expansion of existing steel factory on land currently used for the Atkinson playfield. P&DD is working with DEGC to acquire additional property for the playfield replacement project. 		
<ul style="list-style-type: none"> Core City Neighborhoods - in-fill residential development project within the boundaries identified on attached map. Immediately south of shaded area is the Jeffries Hope VI project which consists of mixed-income residential development on the existing project site and scattered in-fill in the areas bounded by Warren, Jeffries Freeway, Fisher Freeway and Lodge Freeway. 		<p>5-16</p>
<ul style="list-style-type: none"> Habitat for Humanity (Core City) - residential development for low to moderate income households. Project area is bounded by Michigan Ave., W. Grand Blvd., M.L. King Blvd., and the Jeffries Fwy. 		
<ul style="list-style-type: none"> Virginia Park Development Plan - Redevelopment Plan just north of the I-94 project area. Plan is being modified and land should be available for disposition in the Fall, 2001. Proposed project consists of residential developments (scattered site and contiguous projects, where appropriate) throughout designated development plan area. 		
<ul style="list-style-type: none"> North Village aka New Amsterdam Project (Woodward Ave. and Burroughs) - consists of the rehabilitation of five buildings into residential, retail/commercial and parking along with the 		

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Development Projects within the project area (continued)

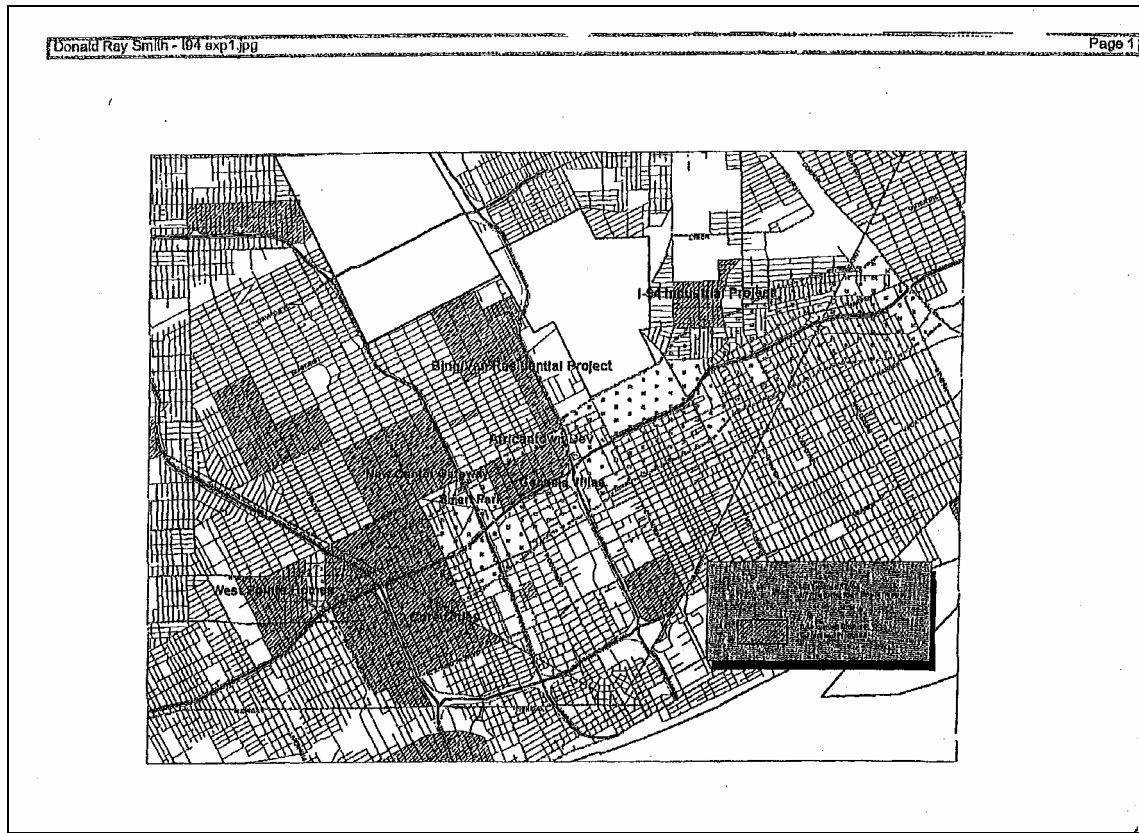
Page 5 of 5

construction of new loft residential and commercial space. In total, the project will produce approximately 60,000 sq. ft of retail/commercial space, 237 units of rehabilitated housing, 153 newly constructed housing units and 361 parking spaces.

- ▶ New Amsterdam/Gateway/Smart Zone (Tech Park)- The sponsors of the smart zone" research and technology park in the vicinity of Wayne State University (WSU) and Detroit's New Center District. In the first phase, the former Chevy Creative Services Building would be renovated into Tech Park One, comprised of 34,000 square feet of research and technology incubator space, 11,000 square feet of businesses assistance agencies and 73,000 square feet of multi-tenant space. The WSU/City of Detroit Smart Zone Project is a great opportunity to develop a certified technology park within the City of Detroit and have it affiliated with one of Michigan's premier research institutions. Project is bounded by Warren Ave. to the north and Forest Ave. to the south.
- ▶ Picty Hill (bounded by Pingree, Woodward, Russell and Grand Trunk railroad right-of-way) - in-fill residential housing project targeted toward low and moderate income households.
- ▶ Africantown Development - proposed retail/commercial development. Area specific sites have not been identified, to date. Project area is E. Grand Blvd and Hastings.
- ▶ Bing/Van Residential Development (see attached map) - scattered site in-fill residential project.
- ▶ Forest Park (Mystery Tenant) - developer cannot disclose tenant until site plan review process is initiated. Tenant is a high tech light manufacturing/warehouse facility on the Forest Park site currently being leased to Greektown Casino for parking.
- ▶ I-94 Industrial Park Project - a total of 2.2 million square feet of warehouse/industrial buildings. The industrial park will comply with the Michigan Economic Development Corporations standards for a Modern Industrial Park certification (meaning landscaping, modern amenities, and special land use restrictions). Project is bounded by Grinnell and Huber to the north; Mount Elliott to the west; Miller to the south; and St. Cyril to the east.
- ▶ Genesis Villas (see attached map) - three phase townhouse development project. Over 120 units of new construction low to moderate in-fill housing development.

Lastly, the I-94 Rehabilitation Project is a significant transportation project with impacts to both the community and region. These impacts should continue to be mitigated through continued engineering design and community input.

5-16 cont.



Response 5-1

Comment acknowledged. Extensive coordination with the public, city of Detroit, and the Interagency Coordination Committee (ICC) occurred as part of this project and the MDOT will continue this coordination through the design and construction phases.

Response 5-2

Communications are underway between the MDOT and city of Detroit regarding Transportation Systems Management (TSM) and the installation of hardware for Intelligent Transportation Systems (ITS) technology within the corridor. The MDOT will continue to work with the City during the design and construction phases of the project concerning the inclusion of ITS technology.

Response 5-3

Improving Transit in Southeast Michigan: A Framework for Action, published by SEMCOG in October 2001, did not include I-94 in the 12-corridor, 259-mile, transit system it recommended. A number of comments expressed the need to narrow the required right-of-way and reduce right-of-way impacts. As a result, the Recommended Alternative no longer provides for transit options in the median. However, the continuous service drives will present opportunities for transit. Coordination will continue with DDOT and SMART to accommodate more bus transit in the corridor and how to encourage bus use.

Response 5-4

The mainline design speed of the Recommended Alternative will comply with the AASHTO 2001 (p. 507) criteria for urban freeways of 50–70 mph (60 mph desirable).

Response 5-5

The Recommended Alternative for the corridor, described in Chapter 4, reduces the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each side from the DEIS Build Alternative).

The project will provide new sidewalks, at a minimum of 6 feet wide, through the interchanges, along the service drives, and on all reconstructed bridges and cross streets. Pedestrian crossing locations will receive appropriate pavement markings, signage, and signalization, and will be designed to accommodate Intelligent Transportation Systems Technology.

Public involvement activities, including the Context Sensitive Solutions workshops described in Appendices G and I, and discussions among the MDOT and a number of city of Detroit Departments will help determine the mitigation measures for traffic accessing the residential neighborhoods adjacent to the continuous service drives (such as landscaping or other traffic calming techniques). Specific locations and measures will be identified during the design phase of the project. The city of Detroit will be the entity responsible for determining which traffic access measures to implement on residential streets in the study area.

Response 5-6

The methodologies and assumptions used for the analysis of noise impacts are documented in FEIS Section 5.6. All environmental impacts of the I-94 Rehabilitation Project are documented in this FEIS in accordance with the applicable State and federal laws and regulations. As described in FEIS Section 5.6.6.4, three noise barrier locations satisfy both the cost and acoustic

components of the MDOT's 1996 noise abatement policy guidelines for feasibility and reasonableness and are proposed for the I-94 Rehabilitation Project. Noise barrier locations are committed by the MDOT to be re-evaluated prior to final design. Mitigation measures will be put in place during construction to address noise pollution, and is discussed in FEIS Section 7.6.

Response 5-7

The Recommended Alternative will address existing drainage problems by providing a new state-of-the-art drainage system with adequate capacity for 100-year storm events for the existing and additional paved areas. The additional storm water runoff created by the additional paved areas will be detained on-site and released to the Detroit combined sewer system at a rate that does not exceed the current maximum rate. A Storm Water Pollution Prevention Plan will be prepared and implemented during construction. The details of the water quality mitigation measures are discussed in FEIS Section 7.10.

Response 5-8

Coordination between the MDOT and the community regarding the historic properties within the corridor has been ongoing since the beginning of the project and are being implemented in accordance with SHPO and ACHP policy. Context Sensitive Design Workshops during the design phase of the project will continue the coordination of historic properties with the community. Details on coordination are provided in FEIS Section 6.6.

Response 5-9

All pedestrian walkways and crossings will provide modern and safe designs complying with the AASHTO, FHWA, MDOT and ADA standards. The proposed reconstruction of I-94 will improve overall pedestrian circulation within the corridor and provide more efficient movement in all directions.

Many of the existing streets within the corridor do not have adequate pedestrian crossing facilities. The project will provide new sidewalks, at a minimum of 6 feet wide, through the interchanges, along the service drives, and on all reconstructed bridges and cross streets. Pedestrian crossing locations will receive proper pavement markings, signage, and signalization, and will be designed to accommodate Intelligent Transportation Systems Technology.

Continued public and stakeholder involvement, through activities such as the Context Sensitive Solutions workshops described in Appendix G and other forums during the design phase of this project, will help determine the aesthetic elements to be included in the design of pedestrian facilities.

The City will have the opportunity to review all proposed pedestrian crossing additions and removals during the design phase of this project. As is stated in Response 5-5, the City is the entity responsible for deciding which traffic access measures to implement on residential streets in the study area.

Response 5-10

The MDOT staff and the MDOT Real Estate representatives will meet with the Department of Public Works regarding the design of the Recommended Alternative and the continued operation of its facility.

Response 5-11

The DEIS air quality analysis utilized the Livonia monitoring station due to malfunctions at monitoring sites located in closer proximity to the corridor. The Air Quality analysis conducted for the Recommended Alternative utilized the Linwood monitoring station, which is located in the city of Detroit and within the project corridor. Refer to FEIS Section 5.5. The air quality analysis included in this FEIS explains the rationale for selection of an air quality monitoring station for use in the analysis.

Response 5-12

The Recommended Alternative has reduced the right-of-way impacts and other impacts to the community and meets the purpose and need for the project. The I-94 Rehabilitation Project is not identified by SEMCOG as an approved transit corridor and does not have the ridership to support mass transit. SEMCOG adopted a transit plan entitled *Improving Transit in Southeast Michigan: A Framework for Action, October 2001*. This plan identifies a 12-corridor, 259-mile, transit system for Detroit. I-94 is not a part of that system.

Coordination between the MDOT, DDOT, and SMART will continue to ensure that the I-94 Rehabilitation Project will accommodate and encourage bus service in the project area. The formation of the Detroit Area Rapid Transit Authority (DARTA) will help further the needs of transit in the area.

The concept of flexible funding does exist for qualifying federal funds, like the Surface Transportation Program (STP). Although it is used regularly for smaller local projects, given the size of this project and the limited amount of money available to flex, it would not be feasible. State and local preservation projects as well as safety and enhancement projects obtain funds through STP and the need far outweighs the availability. Theoretically, some transit money like Section 5307 funds could be ‘flexed’ and used for highway projects, however this need also far outweighs availability. Most importantly, these flex dollars could only be used for capital and not operating expenses, which limits the applicability to enhance transit services. In other words, these funds could be used only to purchase buses but not to operate any service.

Response 5-13

As stated in Response 5-5, the Recommended Alternative for the corridor reduces the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each side from the DEIS Build Alternative). The Recommended Alternative does not preclude the use of the bus transit along the services drives.

Response 5-14

The MDOT will meet with the city of Detroit Planning Division’s Urban Design Unit to discuss expected right-of-way impacts within the corridor as the project progresses to the design and acquisition phases. Actual taking of individual parcels, especially partial takes, will not be finalized until the design stage.

The MDOT recognizes the significance of the lower and middle Woodward areas to the city of Detroit and the greater metropolitan area, and the importance of implementing an urban design concept that conveys their local and regional values. Context Sensitive Design workshops during the design phase of the project will allow opportunity for community involvement regarding urban design issues such as this one.

Response 5-15

Specific right-of-way treatments will be addressed through the Context Sensitive Solutions workshops, described in Appendix G and through ongoing coordination with the public and agencies in the design phase of the project. Aesthetic treatments are discussed in FEIS Section 7.7 and a conceptual design plan is described in Chapter 13.

Response 5-16

The analysis of the Recommended Alternative utilized SEMCOG's 2025 travel demand forecasting model for southeast Michigan. The model accounts for as much projected development as possible. In addition, the listed developments were considered in the indirect and cumulative impacts analysis discussed in FEIS Section 5.15. Additional coordination was done with SEMCOG and the city of Detroit Planning and Engineering Departments to understand all development projects within the study area.

Letter 6: City of Detroit, Department of Public Works



CITY OF DETROIT
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March 27, 2001

Jose A. Lopez, Public Hearing Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

RE: Comments on the Draft Environmental Impact Statement (DEIS) for the I-94 Rehabilitation Project

Dear Mr. Lopez:

The City of Detroit (City) has reviewed the DEIS for the I-94 Rehabilitation Project. We believe the study thus far has addressed many of the issues set forth by the City in the past. The current build alternative addressed our issues regarding reserving space on the freeway for Transit, minimizing the impact on two key neighborhoods and correcting the current design of the M-10 and I-75 interchanges.

We favor moving this alternative forward to the next phase but ask that some additional analysis and refinement address the remaining concerns.

Those concerns are outlined below:

- 1) Vehicular and pedestrian overpasses - more discussion as to the locations and number of overpasses necessary to address access issues for both Pedestrians and Transit.

Criteria for removal of any pedestrian bridges should be evaluated to ensure pedestrian friendly environment. The distance for pedestrians to walk in order to cross the freeway shall be minimized and signalized locations shall be made available for safe pedestrian crossing. The City shall have the option to determine whether removal of a pedestrian bridge for re-locating the pedestrian bridges on a case by case basis during the design phase of the project.

During the early part of the design phase, the City will like to have a list of properties to be acquired for the project for determining impact on the neighborhood.

Brush is currently one way north bound at I-94. The project includes new ramp at brush with an assumption that the Brush street will be modified for two way operation. Further discussion with the City is necessary before final determination is made.

DENNIS W. ARCHER, MAYOR

6-1



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I-94 Rehabilitation Project
March 27, 2001
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2) Continuous Service Drives - speed and signalization is still a concern.

The additional length of service drives and lanes will require further review with the state to compensate for additional maintenance cost.

The city shall modify the lane usage of service drives as and when necessary.

The addition of a third multipurpose lane is most beneficial if the land strips along service drives are planned for commercial developments.

Any street that is required to be discontinued/cut off from accessing the service drive will be evaluated by City to determine its relevance to safety and geometric issues. This can only be determined during the design phase.

Treatment of the discontinued/cut off streets and alternatives provided to the city to determine the best proposal in minimizing the impact on residences as well as business shall be discussed in detail during design phase of the project. The alternative should also be effective in mitigating the impact on garbage pick-up, snow removal, fire emergency vehicles and delivery services to serve the affected business/residences. Modifications required must be part of the design cost.

6-2

3) Maintenance and impact on City facilities and the city's ability to maintain operations before during and after construction.

During re-construction of I-94, accessing major business/traffic generators such as City Airport, Wayne state University, Cultural Center, New Center Area and Downtown should be prioritized to minimize the impact.

Russell Street will be discontinued at I-94, the north bound traffic will be maintained using the proposed new road way (west of Grand Trunk RR), but the south bound traffic will not be able to use the new roadway south of west bound service drive. The southbound surface access will require use of East Grand Blvd/ St. Aubin and loop around I-94 ramp for FWY access. There will be major impact on City facilities which may affect city services to the public. We seek more discussion and perhaps a traffic study and construction plan to determine impacts and mitigation necessary. Also, more discussion on the bypass road proposed to replace Russell Street is necessary. Since Russell Street is a commercial frontage road, alternatives suggested may impact residential property.

6-3



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- 4) Retaining walls and noise buffers -additional discussion on the proposed retaining walls and/or noise barriers.

What noise abatement measures will be done for residents that live along areas of the freeway where noise barriers will not be constructed?

6-4

- 5) Other projects underdevelopment or underway how will they be comprehended in the

I-94 Rehabilitation project such as the Intermodal Freight Project or the proposed Light Rail Project from Metropolitan Airport

6-5

- 6) We reviewed the air quality data and put the following question comments.

Why was air quality monitoring data for the project area taken from the Livonia monitoring station? This question was based upon information provided in section 5.5.4.2 "Existing conditions." Tables 5-10 and 5-11 on pages 5-52, 5-53 shows air quality monitoring stations that were located in Detroit, within the project area. More traffic, and therefore, air quality would be impacted there!

6-6

Is this project going to remove green space along the side of the freeway, and if so, how will this affect the storm water runoff?

6-7

The Air Quality Impacts need to be revised in light of the Courts decision on Ozone (O_3) and Particulate Matter 2.5 microns or smaller ($PM_{2.5}$). Based upon the monitoring data Detroit will be designated non-attainment for Ozone (see attached maps). In addition, the State Implementation Plan (SIP) calls for a reduction in Nitrogen Oxides (NO_x) which may go beyond the reduction in NO_x emissions the Environmental Protection Agency (EPA) is seeking from the Utilities.

6-8

The project is required to comply with the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Asbestos, Code of Federal Regulations, Title 40, Part 61, Subpart M, before preceding with the demolition of acquired commercial, industrial and residential structures part of the project.

6-9

How will the proposal address Vehicle Miles Traveled (VMT) and corresponding increase in NO_x ? What NO_x offsets occur as a result of congestion mitigation, if any?

6-10

VMT analysis is essential to determine what extra lanes are to be used for. Analysis needs

6-11



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to be done now or it will never be done.

Southeast Michigan has had (3) three ozone excursions in 1999 and consequently are in maintenance. What measures have been done to assure that the project will not cause future ozone excursions.

6-12

Michigan is presently evaluating its NO_x compliance and is developing a SIP to comply. Industries within the Detroit Metropolitan area have been called to examine their contributions to NO_x and negotiate the allowances. What are we doing about mobile sources?

6-13

Other issues for further discussion is the potential for the construction of land bridges and the funding. If you would like to discuss these comments further please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie R. Green".

Stephanie R. Green
Interim Director

SRG/lt

xc: A. Nwankwo
N. Seabrooks
G. Robinson
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March 29, 2001

Jose A. Lopez, Public Hearing Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. BOX 30050
Lansing, Michigan 48909

RE: **Supplemental** to comments on the Draft Environmental Impact Statement (DEIS) for I-94 Rehabilitation Project

Dear Mr. Lopez:

Please find below the supplement to our comments submitted to you on March 27, 2001. These comments are in detail concerning transit issues from the Detroit Department of Transportation.

Comments

DDOT staff has completed its review and submits the following comments as it relates to the above referenced project. It is my understanding that concerns expressed by DDOT at meetings held in 1999 and 2000 focused on the issue of bridge removal and its impact on DDOT bus operations (miles and costs), pedestrian access to bus stops and service drive capacities. Today's draft document, though more detailed as it relates to service drive capacities provides no specifics on proposed bridge removal, except for on Cadillac. Therefore, it is impossible to site specifics other than the Cadillac Bridge in our comments on this matter. Enclosed is preliminary information on the project's impacts (eg. bridges DDOT currently uses for north/south access).

Removal of the Cadillac Bridge will impact three (3) routes: #7 Cadillac, #11 Clairmount and #34 Gratiot. We believe it will also impact some service provided by SMART. Both revenue and deadhead mileage will increase on the Cadillac and Gratiot routes, respectively.

Although the narrative found on Page 4-31 discusses DDOT service and the Cadillac Bridge removal, there is no discussion of anticipated turning modifications to existing traffic movements. Northbound turning movements from Gratiot to westbound Harper are currently prohibited. If no modifications are made nor anticipated by the planners of this project, then DDOT will also lose access to a significant transfer stop at Gratiot and Harper, inconvenience customers or worse lose ridership. Our projected annual mileage increase and cost for this one (1) bridge removal is not available at this time.

DENNIS W. ARCHER, MAYOR

6-14



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DDOT currently uses freeway bridge access on:

Conner

Conner
 Van Dyke
 Chene

Cadillac

Cadillac
 Clairmount
 Gratiot

Van Dyke

Van Dyke

Mt. Elliott

Conant

Chene

Chene
 Grand Belt

Beaubien

Oakland

Woodward

Woodward

Not knowing which of these may be recommended for removal does not allow for adequate review and comment. Each of these routes operate within the scope of a specific number of trips. The total miles and hours for these trips will be impacted due to not only any bridge elimination but overall shutdown of the freeway. Re-routes will be necessary. Over a period of months this will result in a substantial increase to DDOT's operating costs. I strongly request that means to mitigate these costs be sought during negotiations with MDOT to lessen the budgetary impact on the City.

North/south access by pedestrians to bus stops, even if bus routes utilize the continuous service drive concept is critical. Every two (2) miles may not be adequate for densely populated areas or generators of service demand. Careful consideration of pedestrian needs must remain a high priority in design.

Development of the continuous service drive at this point could be of benefit, particularly if signalization improvements are made. The key success to this still remains retaining access by pedestrians from the adjoining neighborhoods.

Again, we are very pleased to see the inclusion of a dedicated lane of service to accommodate various modes of transportation. However, we are concerned though that the answer to roadway

6-15




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congestion is "adding lanes" for general use, which appears to be the approach for this project. Although Page 4-17 indicates that "reserved space in the median could be used for transit" it goes further to state that "transit is currently not considered for implementation as part of the project". Why not? The study also indicates that HOV lanes are not feasible. If not HOV use nor transit, then what will be the "use" (multi-use) of the lane? I am requesting that the title might be revised to read "Public Transportation/High Occupancy Vehicle Lane" to remove confusion and doubts about its use as a possible commercial carrier lane or single occupancy vehicle lane.

6-15 cont.

If you have any questions, please feel free to contact me.

Sincerely,


Stephanie R. Green
Interim Director

SRG/lt

xc: A. Nwankwo
N. Seabrooks
G. Robinson
M. Patel
C. Gibbons-Allen



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I-94 REHABILITATION PROJECT

DDOT Routes In Revenue Service Impacted By Freeway Reconstruction

Grand River
Fenkell
Linwood
Hamilton
Dexter
Woodward
Medical Center Shuttle
Oakland
Chene
Clairmount
Conant
Van Dyke
Gratiot
Cadillac Harper
Conner
Grand Belt
* Russell
* Imperial
* Plymouth

* Revenue service that travels under the freeway

6-15 cont.

Response 6-1

The relocation and removal of pedestrian bridges have been and will continue to be discussed in detail with the city of Detroit during the design phase of the project. Discussions with the city of Detroit will continue regarding the conversion of Brush to two-way operation. As of the spring of 2004 it was agreed that Brush will be a two-way operation across I-94.

A list of properties to be acquired for the project will be further refined during the design phase of the project and will be shared with the city.

Response 6-2

Detailed discussions have taken place between the city of Detroit and the MDOT regarding the continuous service drives, and specific issues such as signalization, speed, and local street access. The additional service drive length will require maintenance. The laneage is agreed upon by the FHWA, the MDOT, and the city of Detroit to be two 11-foot lanes with an 8-foot shoulder. No streets are proposed to be closed at the service drive unless there is a grade difference and can not be accommodated. The only locations are near the freeway to freeway interchanges and adjacent to railroad crossings. Development of land along the corridor is addressed by city of Detroit local planning and zoning functions. Further coordination will occur in the design and construction phases of the project.

Response 6-3

A detailed construction plan will be prepared for the Recommended Alternative in advance of construction. Access and the reduction of impacts to major business/traffic generators will be prioritized and coordinated with the City. A maintenance of traffic plan will be prepared in the design phase of this project to address traffic routing and safety issues.

Russell Street is continuous under I-94 and the service drives in the Recommended Alternative. The Recommended Alternative for the corridor, as shown in the conceptual design plan in Chapter 13, does not require the discontinuation of Russell Street at I-94 or creation of a bypass road as described in the comment. Through further analysis and modifications of the DEIS Build Alternative it was retained.

Response 6-4

Noise abatement, including placement of noise barriers, is discussed in FEIS Section 7.6. Further analysis of noise abatement will be done during the design phase of the project which will account for changes in density and development. Treatment of retaining walls to absorb sound can be part of the retaining wall design to provide additional noise reduction.

Response 6-5

The DIFT data was included in the analysis of the Recommended Alternative. The Metro Airport to Detroit transit study will not directly affect this section of I-94, as the alignments are not directly in the I-94 Rehabilitation Project limits, as it runs west of the study area. These projects, however, are included in the SEMCOG traffic model and are reflected in the I-94 traffic projections within this general area of analyses. For details regarding these studies, refer to FEIS Section 2.2.

Response 6-6

The DEIS air quality analysis utilized the Livonia monitoring station due to malfunctions at monitoring sites located in closer proximity to the corridor. The Air Quality analysis conducted for the Recommended Alternative utilized the Linwood monitoring station, which is located in the city of Detroit and within the project corridor. Refer to FEIS Section 5.5. The air quality analysis included in this FEIS explains the rationale for selection of an air quality monitoring station for use in the analysis.

Response 6-7

The exact amount of green space impacted in the corridor has not yet been determined. It will be finalized during the design phase. The Recommended Alternative will include additional paved areas compared to the existing condition, and it is expected that storm water runoff will increase. Any increases in runoff will be detained on-site and outlet into the City sewer system at a rate no greater than the current flow. The new drainage system with in-line detention will address water quality and flow concerns.

Response 6-8

Air quality impacts have been assessed in accordance with the latest state and federal requirements and have been revised for this FEIS. Wayne County is classified as an attainment-maintenance area for the one-hour O₃ standard. The maintenance area includes all 7 counties in S.E. Michigan. On July 22, 1998, the EPA revoked the one-hour ozone standard for the areas that previously were classified as attainment-maintenance and replaced it with the new eight-hour O₃ standard, though conformity still applied. On October 25, 1999, the revocation was rescinded. On April 15, 2004, an eight county area, including Wayne County, was designated as a moderate non-attainment for the eight-hour O₃ standard. On September 17, 2004, EPA redesignated the area as marginal/nonattainment for the eight-hour O₃ standard. As such, it must reach attainment by June 2007.

All areas of Michigan are classified as in attainment for PM₁₀, Pb, SO₂ and NO₂. The EPA and the Michigan Department of Environmental Quality (MDEQ) currently are collecting data to determine PM_{2.5} attainment status. It is highly likely that Wayne County will be within the area designated by EPA as nonattainment for the PM_{2.5} standard. Refer to FEIS Section 5.5.

Response 6-9

The MDOT building demolition procedures comply with all state and federal requirements for the handling and disposal of asbestos and will be adhered to during the construction phase by the contractors.

Response 6-10

The project's impact on regional VMT and potential impacts on regional pollutant levels, such as NO_x, will be addressed in SEMCOG's TIP analysis. The regional or mesoscale air quality analysis determines a project's overall impact on regional air quality levels. A transportation project is analyzed as part of a regional transportation network developed by a county or a state. Projects in this network are found in the Regional Transportation Plan (RTP) and the Transportation Improvement Program (TIP). The RTP and TIP includes a regional air quality analysis utilizing regional VMT and VHT estimates, to determine if emissions are within the

emissions budget for the area. The results of this analysis determine if an area conforms with regulations set forth in the Final Conformity Rule.

The I-94 Rehabilitation Project currently is listed in the 2030 RTP developed by the Southeast Michigan Council of Governments (SEMCOG). A conformity analysis was run and the RTP did demonstrate conformity. However, at SEMCOG's 11/4/04 General Assembly meeting, three changes were made to the plan that require a new analysis be completed before the RTP, which contains the I-94 project, can be officially approved.

The new conformity analysis was completed December 1, 2004.

At that time, it will be submitted for FHWA approval. The regional analysis performed for the RTP and TIP will incorporate the effects of this project and will satisfy the regional requirements set forth in the Final Conformity Rule.

Response 6-11

The additional through lanes on I-94 are to accommodate current and predicted traffic volumes through rigorous analysis over the past 10 years of study. The auxiliary and acceleration-deceleration lanes will improve operations and reduce interference in the through lanes, due to exiting and entering traffic. The proposed lane configuration is recognized in the SEMCOG traffic model, was used in the air quality conformity analysis and will appropriately handle future traffic volumes.

Response 6-12

As stated in Comment 6-10, the project is included in the adopted RTP developed by SEMCOG. As part of the on-going analysis and the area's regional plan, the project's effect on regional ozone levels is incorporated within SEMCOG's analysis.

Response 6-13

SEMCOG has actively pursued ways to reduce ozone precursor pollutants from transportation sources. The Ozone Action program is one such way.

"Industry is well-regulated and has greatly reduced its emissions. People, however, tend to live - and pollute - much more freely. Studies show that the combined activities of individuals regularly create nearly 50 percent of the pollutants that cause ground-level ozone. It is not unheard of for exceedances of the ozone standard to take place on Saturdays - when most industrial emissions sources are shut down or operating at reduced rates. This illustrates that the activities of individuals are part of the problem; Ozone Action makes it possible to be part of the solution, as well.

Automobile use is a good example of how much we pollute and how much we can reduce pollution. Combined travel in Southeast Michigan adds up to more than 120 million miles per day and a huge amount of emissions. If Southeast Michigan reduced its automobile use by just 20 percent, we could eliminate more than 100 tons of ozone-forming pollutants from the air on every Ozone Action day.

On Ozone Action days, people can choose to reduce the emissions that cause ground-level ozone. Following these tips - on Ozone Action days or any day - means cleaner air for everyone. Some tips are:

- **Combine trips or consider car and van pools or public transit** for commuting or - even better - enjoy the day by choosing to ride a bicycle or walk to various errands and activities.
- **Stay informed.** Ozone Action days are announced during weather reports on both television and radio and in local newspapers. Finding out if today or tomorrow is an Ozone Action day provides opportunities for planning activities accordingly.
- **Share the knowledge.** Every time the Ozone Action message is multiplied, more people get involved "clearing the air" in Southeast Michigan. Individual behavior makes a difference.

Above and beyond the Ozone Action program, government regulation of industry, and enforcement of the Clean Air Act, we have seen, government and industry cooperation in reducing emissions. Automobiles were equipped with on-board vapor-recovery systems beginning with the 1998 model year. Utility companies are phasing in new emission controls as they implement environmental upgrades. Cleaner fuels are being used in Southeast Michigan. State and federal governments are using alternative fuel vehicles in their fleets to decrease their contribution to the ground level ozone problem. Stringent penalty provisions in the law are ensuring compliance from industry.“

(Source: SEMCOG website: <http://www.semcog.org/Services/OzoneAction/FAQS.htm>)

Response 6-14

Following the DEIS Public Hearing, held March 5-6, 2001, and receipt of public and agency comments on the DEIS, three modifications to the DEIS Build Alternative were developed to respond to the comments received. All three modifications to the DEIS Build Alternative scaled down one or more components (service drives and/or median space) of the DEIS Build Alternative, and combined with the DEIS Build Alternative, offered all possible combinations of medians with and without reserved space, and two and three lane service drives. Meetings were held with DDOT to discuss the agency needs and concerns. As part of this continued coordination process since the DEIS, the overpass at Cadillac was retained in the Recommended Alternative as a result of the comments from DDOT.

Response 6-15

Coordination meetings with the DDOT and MDOT have taken place regarding the Recommended Alternative. DDOT has expressed support for the proposed design, indicated interest in utilizing the continuous service drives to expand bus service within the corridor, and communicated specific service-related requirements to the MDOT. Continued coordination with DDOT will take place during the design and construction phases of this project to minimize any impacts to existing service routes and obtain input regarding features to accommodate and enhance transit service. Specific locations for bus stops and other amenities will be determined during the design phase of the project.

The DEIS Build Alternative reserved median space was intended to provide accommodation for future transit or other transportation alternatives within the corridor. The Recommended Alternative for the corridor no longer includes the reserved median space nor the wider multi-use lane on the service drive.

Subsequent to the DEIS being circulated, SEMCOG, the Metropolitan Planning Organization (MPO) for the Detroit urbanized area, issued a report entitled *Improving Transit in Southeast Michigan: A Framework for Action, October 2001*; the report which identified a 12-corridor, 259-mile, transit system for the Detroit area. The I-94 corridor was not included in that system. Even though transit was not recommended for the corridor, coordination occurred with DDOT and SMART to identify current and potential bus routes and begin the process of selecting appropriate features for accommodating bus service in the project area.

Since HOV lanes could not be studied solely within the confines of the project termini, a southeast Michigan HOV study was conducted for the seven-county region. The study (*Southeast Michigan High-Occupancy Vehicle Feasibility Study, 1999*) was documented in a separate report submitted to the MDOT on May 7, 1999. The HOV study did identify two Interstate highway segments in Southeast Michigan as meeting the criteria for consideration of HOV lanes: I-75 northbound and southbound from I-696 to M-59, and I-96 eastbound and westbound from US-23 to I-696. The I-94 study area addressed in this FEIS was not identified as having good potential for HOV due to the threshold of traffic volume.

Six of the seven streets that DDOT indicated it currently uses to cross I-94 (Conner, Cadillac, Van Dyke, Mt. Elliott, Chene, and Woodward) will continue to include bridges over I-94 in the Recommended Alternative. A crossing at Beaubien can not be maintained with the Recommended Alternative due to vertical clearance requirements for the I-75/I-94 interchange ramps. An overpass is provided at Brush, which will be a two-way facility, with the Recommended Alternative. Coordination with the city of Detroit has taken place regarding proposed vehicular and pedestrian bridge removals. Construction of the Recommended Alternative would result in the removal of two pedestrian-only bridges, leaving six remaining pedestrian-only bridges. The first removal is the Brooklyn Street pedestrian bridge over I-94, located between Trumbull Street and M-10. The second removal is the Canfield Avenue pedestrian bridge, located south of I-94 and Forest Avenue. All other pedestrian-only bridges are being replaced in their current locations or within one block. Nine combined existing vehicular/pedestrian bridges also would be removed (seven over I-94 and two over I-75). The loss of the nine combined vehicular/pedestrian bridges would result in longer walking distances; however, this increased distance often is only one additional block and never greater than three blocks.

Letter 7: City of Detroit, City Planning Commission

Arthur Simons
Chairperson
Susan Glaser
Vice-Chairperson
Marsha S. Bruhn, AICP
Director
Marcus D. Loper
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City of Detroit

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August 13, 2001

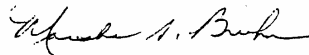
Mr. Jose A. Lopez,
Acting Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Lopez:

Attached you will find the recommendations of the Detroit City Planning Commission, as approved on July 5, 2001, regarding the Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation of the I-94 Rehabilitation Project. The Detroit City Council requested that this be sent to you, and it is anticipated that the Council will hold a discussion on this matter and possibly pass a separate resolution when the Council returns from recess in September.

Please consider these recommendations when preparing your final design. If you have any questions, you may contact either Mr. Greg Moots or Mr. Marcell Todd of our staff at (313) 224-6225.

Sincerely,



Marsha S. Bruhn, Director

Cc: James Kirschensteiner, Federal Highway Administration
Mr. Winston Stebbins, MDOT Design Division

Arthur Simons
Chairperson
Susan Glaser
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Kathleen Wendler
Roy Levy Williams

July 27, 2001

HONORABLE CITY COUNCIL

RE: Proposed Expansion of I-94 Freeway (RECOMMEND APPROVAL OF ALTERNATIVE PROPOSAL)

The City Planning Commission (CPC) has reviewed the Draft Environmental Impact Statement (DEIS) prepared by the Michigan Department of Transportation (MDOT) for the proposed expansion of the I-94 Freeway between Connor Rd. and I-96. The primary study area is bounded by 30th street to just east of Conner and a half mile on each side of the existing centerline of I-94. A secondary study area is bounded by an area just west of the city limits to the I-696 interchange in Macomb County. Various groups have raised many questions and concerns about the expansion at public hearings held before City Council and the Commission.

This proposal, referred to as the Build Alternative, represents a very significant expansion of the freeway segment to over 300 feet wide (outside of the interchanges), at a cost of approximately \$1.3 billion. MDOT states in the DEIS that "This proposed project is the first of other I-94 improvement projects in Southeast Michigan", so it seems that this project could set the pattern for the improvements on adjacent segments to the east and west. This adds special importance to the review of this first project, as there seem to be cumulative impacts that are not addressed.

The proposed Build Alternative would provide two additional driving lanes (one in each direction), acceleration/deceleration lanes, continuous three lane service drives on both sides of the freeway, 55 feet of reserved space within the median, an upgrade of the M-10 and I-75 interchanges with continuous service drives, the removal of all left-hand ramps and the reconstruction of existing roadway and bridges.

PUBLIC HEARING RESULTS

On May 17 of this year, the City Planning Commission (CPC) held a public hearing on the above matter. All non-MDOT speakers had serious concerns about the project. Following is a brief summary of the issues raised by members of the public at that hearing.

7-1

7-2

Draft Environmental Impact Statement (DEIS) Presentation

There were comments that the DEIS prepared by MDOT did not present a neutral assessment of the alternatives, that it reads like a prospectus for the "Build Alternative", the major rebuilding and expansion of the freeway. Comments were made that there does not seem to be enough data to fully compare the three alternatives discussed. There are two much-less costly alternatives presented and then the "quantum leap jump" to a major overhaul of the freeway.

7-3

Impact on the Community

There was agreement that I-94 needs to be re-built, including the pavement and many of the bridges. All speakers felt that the proposed expansion is far too wide (the equivalent of 24 lanes, or more than 300 feet). The widening would displace some residents, but if the sections of the freeway to the east and west are expanded to the same degree, there would be extensive displacement of residents and businesses. It was stated that the portion of the City chosen for this first phase (6.7 miles between I-96 and Connor) was chosen because of the low income of its residents and the sparseness of its housing stock.

7-4

Questions were raised by Art Center-area residents about how City services would be provided to residents along Hendrie Street, which would become a three-lane service drive. In addition, the Art Center Development Plan shows a landscaped buffer north of Hendrie, rather than the freeway expansion.

7-5

Various speakers felt that the widened freeway would create a "Grand Canyon", separating the two sides of the freeway. One said that the "Build Alternative" is overbuilt and delivers a needlessly high level of service at rush hour.

7-6

The cost to the City of the "Build Alternative" is between \$30 and \$40 million, and it must be determined where these funds would come from and what other activities would not be funded.

7-7

There was a question raised about the number and placement of noise walls. MDOT uses fairly stringent standards when determining where walls can be placed, and there were questions about how the area schools would be shielded.

7-8

Health Issues

Some felt that the increased truck traffic that the expansion would attract would lead to increased incidences of asthma along the corridor. Diesel emissions from trucks are a major source of particulate and carcinogens. Detroit children have been found to have three times the national rate of asthma. There were various environmental justice issues raised as well. The 48202 Zip Code that the freeway goes through was identified in a University of Michigan study as a major area in the state for asthma and cancer.

7-9

Mass Transit

Many speakers felt that MDOT has not adequately considered mass transit as a complement or even an alternative to the expansion of the freeway. MDOT says that nothing that it is doing precludes mass transit, but it seems to be doing little to encourage it. The DEIS states that there is not enough ridership to support mass transit as an alternative to the widening or enough interest in High Occupancy Vehicle (HOV) lanes to justify their creation. A fifty-five foot wide center median would be reserved for "future use", but speakers commented that is impractical for

7-10

use by mass transit because of its short length and the lack of stops within the corridor. It, therefore, seemed likely that the space would be used for a dedicated truck lane, according to some speakers.

There was a comment made that the east-west rail right-of-way north of I-94 that connects to the "Dequindre Cut" would be converted into a roadway to serve the DPW yard at Russell-Ferry, and this would increase the travel time of a Detroit-Pontiac train by lengthening the route.

Several speakers felt that it would be both better and cheaper for the City and its residents to make necessary repairs to the freeway and to construct a commuter rail system linking Detroit to Mt. Clemens, Ann Arbor/Metro Airport, and Pontiac. Ridership on mass transit could eliminate the need for one highway lane. Construction mitigation funds are made available from the federal government as part of its funding of freeway projects, and these funds could be used to provide "seed" money for a mass transit system. It was pointed out that approximately a third of Detroit residents do not have cars and hence would not benefit from the expansion at all.

ANALYSIS

The CPC agrees with some of the hearing speakers that if the Build Alternative were constructed for the entire length of I-94 in the City and the suburbs to the east and west, the impact would be tremendous. There are hundreds, if not thousands, of residents and businesses that would be displaced. This would make certain segments of the project considerably more expensive than what is being proposed now within the study area. In addition, the CPC questions whether suburban communities would support the expansion. If the freeway is not widened for a much longer distance than the 6.7 miles currently proposed, there seems to be limited benefit for having additional traffic lanes and the median within the study area only.

The CPC has reviewed many of the concerns raised at the public hearing and has also reviewed other possible impacts of the proposed Build Alternative plan. While The CPC disagrees with certain features of the proposed Build Alternative, such as its width in the study area, there are still worthwhile elements to consider including continuous service drives, the improvement of freeway interchanges, and increasing peak hour traffic capacity. Furthermore, The CPC contends that if the 55-foot center median were eliminated from consideration, many of the more acceptable features of the proposed Build Alternative could be pursued with minimal or no displacement of homes or businesses.

The following are specific physical modifications the CPC would like to see incorporated in an alternative to the proposed Build Alternative:

Physical and Geometric Improvements

The reconstruction of existing roadway and bridges is recommended for general maintenance purposes that would include the elimination of certain ramps and bridges and the rehabilitation of others. The elimination of the proposed 55-foot center median would allow for the design of additional lanes, auxiliary lanes and continuous service drives without much of the property acquisition as proposed in the Build Alternative. Auxiliary lanes and mainline lanes could be designed closer together and the service drives could be shifted north or south to avoid property acquisition.

7-11

7-12

7-13

7-14

The creation of three lane continuous service drives on both sides of the freeway would be beneficial. They would provide an alternative to the freeway if the freeway is congested or closed due to an accident. They would allow people making short trips to use the service drives instead of getting on the freeway and then quickly exiting, needlessly increasing congestion and volume. The CPC is not sure how many vehicles would use the service drives in lieu of I-94, but it is likely that a percentage will use the service drives if travelling only a few miles. The service drives could improve the efficiency of the delivery of City services such as garbage collection, emergency services, transit, etc. MDOT is also proposing the inclusion of six-foot sidewalks along the service drives.

7-15

The CPC has found that a continuous service drive could be implemented through a number of property acquisitions, which would involve a relatively small number of residential properties. The existing service drives are generally 30 feet wide inclusive of a parking lane and when abutting residential areas. As such, the CPC finds that three lane continuous service drives are desirable and should be designed to be 30 to 36 feet wide in order to avoid property acquisition as much as possible. Properties that may be relocated include two to three properties located south of Harper at Frontenac and Field.

The CPC suggest that there are several locations where the proposed Build Alternative could be modified to avoid the taking of residential, recreational or commercial property for service drives. When alternatives to the proposed Build Alternative are developed, the CPC would desire to see an alternative that avoids the taking of the following areas:

- along the south side of I-94 between Hamilton and Trumbull;
- along the south side of Antoinette between Third and Cass;
- along the south side of Hendrie between Brush and John R. (the CPC does not object to the existing Wayne County maintenance facility being replaced by a buffer);
- one unit of housing in the Fourth and Holden area;
- two properties in the Woodbridge area identified as 5287 Hecla (residential) and 5287 Trumbull (commercial);
- the industrial area north of I-94 between Mt. Elliott and the Conrail Railroad; and
- the residential area north of I-94 between Sheridan and Frontenac.

7-16

Two additional driving lanes in each direction would provide an additional capacity of roughly 4,600 vehicles per hour for the freeway, thereby allowing a maximum 13,800 vehicles an hour to use the freeway at any given point. Traffic engineers find that if no major changes were made to I-94 by the year 2015, traffic would have to be reduced by about 30% during the peak hour in order to flow at Level of Service E (that is, when freeway is at capacity with very little gaps in the traffic flow). Some added capacity therefore appears necessary.

7-17

The creation of full-width shoulders would allow vehicles to pull completely off the road, increasing safety for those vehicles, people changing tires, and allowing vehicles to use the traffic lanes without having to swerve. We would support one 12-foot wide shoulder in each direction, but are reluctant to support two full-width shoulders in each direction because of the uncertainty of their impact on property acquisition.

7-18

The CPC agrees that the interchanges with I-75 and US-10 should be modified to at least remove the left-lane exit ramps and to create the continuous service drives. These modifications will entail significant work but the safety and convenience that results seem to justify these activities. If the right-of-way is not widened as much as MDOT proposes, the acquisitions around the interchanges should be minimized.

7-19

There are currently five "left hand" entrance ramps out of the 100 ramps found along the primary and secondary study areas. The removal of all left-hand ramps could reduce the conflict associated with slower traffic merging into what should be the fastest lane of traffic on the freeway. The CPC agrees that the removal of the ramps should enhance safety and increase the capacity of the freeway.

It appears that a solid argument can be made for the addition of acceleration/deceleration lanes between I-96 and I-75. These types of lanes would reduce the swerving or weaving of cars entering and leaving the freeway. Much of the weaving takes place on I-94 between I-96 and I-75 where motorists leave one freeway and must maneuver through short distances along I-94 to enter another. Since there are not many auxiliary or acceleration/deceleration lanes along the existing I-94 freeway, most weaving takes place on the mainline lanes. The ramp to ramp distances are relatively short, ranging from .09 miles to just over .64 miles, making the weaving movements highly turbulent. Entrance and exit ramps would be redesigned to provide sufficient distances between them to meet MDOT design standards. In addition, acceleration/deceleration lanes along the length of the I-94 study area would improve the free flow of traffic allowing motorists more time to maneuver into gaps within the traffic stream.

7-20

The CPC is still unclear whether a concept incorporating the various features mentioned above, minus the 55-foot center median, would preclude the need to acquire private property. Based on an analysis of the continuous service drive concept, there appears to be very little residential land needed for the additional roadway alignment. If retaining walls instead of embankments are used, acquisition, though still necessary, should be minimized. There are questions that remain. Can some features of the project be traded off for others? Is it better for the City if an I-94 motorist has access to two 12-foot wide shoulders in each direction at the expense of taking part of a residential lot? Is it more important to preserve aging housing stock for Detroiters or to improve free flow traffic conditions for regional transportation purposes?

7-21

Noise

The placement of noise walls is very important to those persons living closest to the freeway. If the freeway is not significantly expanded, it is unlikely that any noise walls would be constructed, since noise would not significantly increase if traffic counts don't. MDOT guidelines call for a maximum cost for barriers of \$30,000/residence, a minimum reduction in noise of 6dBA, and a minimum barrier length of 590 feet.

7-22

All but eight of the 63 noise receptor locations monitored along the project area and interchanges exceeded the Noise Abatement Criteria established in Title 23, Code of Federal Regulations, part 772. These receptors included all land uses. Only residences, recreation areas, parks, hotels and motels, schools, churches, libraries and hospitals are eligible for consideration for noise abatement measures. If freeway capacity is expanded, leading to an increase in noise, then the schools along the corridor should be given special attention for noise reduction. MDOT has said that the final determination of how to handle the schools would be made during the design phase of the project, and that they wouldn't be treated as just one residence when calculating the cost/benefit of the barriers.

7-22 cont.

Additionally, the Commissioners noted that noise violations currently exist on the I-94 freeway. Given the history of noise violations, the Commission recommends that MDOT correct all current noise violations, as well as secure all funding for buffering, construction of walls and maintenance of the buffering and walls, prior to any construction of the freeway. Whatever barriers are required, MDOT must be responsible for financing their construction.

Air Quality/Health

The CPC certainly agrees that it is well-known that an increase in traffic, especially truck traffic, will lead to an increase in vehicle emissions and their attendant negative health impacts. MDOT is correct that cars that are not running efficiently pollute more when crawling in traffic than when they are moving at higher speeds. This means that to reduce emissions on vehicles using I-94, either traffic volume must be reduced or congestion must be reduced. The traffic volume certainly will not be reduced, though mass transit could offer people an alternative to driving. The increase in the average number of people per vehicle would also serve to increase the number of people the freeway can carry without an increase in traffic, and High Occupancy Vehicle (HOV) lanes could encourage people to use this alternative. Unfortunately, Detroit-area residents have shown resistance to carpooling.

For an unknown reason, MDOT chose a Livonia site for its background level when looking at CO concentrations. This site had lower concentrations of CO than the Detroit sites. The Commission members were particularly disturbed that a Livonia site was selected rather than Detroit sites which would seem to be much more relevant. Even with this low background level, however, four of the eight receptor locations are close to exceeding the "Worst Case 8-Hour CO Concentrations". When the higher background level is added, these four locations exceed the eight-hour CO standard.

7-23

The CPC feels that the DEIS should discuss whether the proposed project will meet ozone and particulate matter standards. Noting that air quality violations exist at the present time, the Commissioners recommended that MDOT correct all present air quality violations prior to any reconstruction of the freeway.

Mass Transit

The creative use of construction mitigation funds that are made available from the federal government as part of its funding of freeway projects seems to be a very intriguing option to help encourage and possibly fund mass transit as a complement to expansion of the freeway. It must be noted that the funds are a percentage of the total project cost, so as the scale of the project is reduced, the associated construction mitigation funds would also be reduced.

7-24

7

For rail transit, either commuter or light, to be an effective mode of travel, significant changes will have to be made to the region's bus systems. Presently, if a person were to arrive downtown or in the New Center via rail, they would still face barriers to getting from the train station to their final destination.

Possible Future Actions

If the State chooses to pursue the Build Alternative over the objections of the City, there are several ways that the project can be stopped or changed. One is that if SEMCOG does not include the project in its Regional Transportation Plan and Transportation Improvement Plan, the project is not eligible for Federal funding. The City sits on the SEMCOG board, and SEMCOG may not support the project if the City is opposed to the project. Another is that the City's congressional delegation has said that it would not support the federal funding of projects that the local government does not support.

M-DOT will respond to the comments submitted in writing by the City Council in the final EIS. A recommendation of action will then be made. The final recommendation from MDOT may be one or a combination of the three alternatives. The recommendation would then be submitted to the Federal Highway Administration. Upon review and approval, federal monies would then be released for the design.

Environmental Protection Agency (EPA) Review

Subsequent to CPC's recommendation, staff received EPA's review of the DEIS, which is attached for your convenience. That review supports most of the recommendations made by CPC.

RECOMMENDATION

The City Planning Commission does not recommend proceeding with the proposed Build Alternative as presented, but recommends an alternative proposal that would include the following elements:

1. Removal of the fifty-five foot wide center median.
2. The addition of lanes (through lanes and/or acceleration/deceleration lanes as needed).
3. The addition of 12 foot wide shoulders on one side only in each direction.
4. The addition of the continuous 30 to 36 feet wide service drives in each direction.
5. In conjunction with the continuous service drive concept, the creation of a street east of Woodward and parallel to the service drive for local traffic to protect the residences along Hendrie St.
6. Improvements to the interchanges to, at a minimum, remove the left-lane exit ramps and to create the continuous service drives.
7. Inclusion in the EIS of consideration for the impact of the proposed widening over the entire I-94 corridor from Wyoming to I-696 be prepared.

7-25

7-26

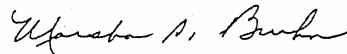
8

8. Inclusion in the EIS of consideration for the passenger-carrying capacity of a SpeedLink-style system down Gratiot, Michigan, and Grand River Avenues and rail connections between Detroit and Ann Arbor, Pontiac, Metro Airport, and Mt. Clemens when looking at the necessity for freeway expansion.
9. Inclusion in the EIS for consideration of the Detroit Intermodal Freight Terminal Study's impact on truck traffic on I-94.
10. Reduction in the spacing between the auxiliary lanes and mainline lanes as much as possible and the "tightening" of ramping geometrics in order to limit the taking of private property.
11. Special consideration given to the schools along the corridor for noise mitigation, and that they not be treated as residences in determining if noise barriers are justified.
12. A close examination of using flexible funding/mitigation of construction impacts monies to fund mass transit in the area.
13. That MDOT correct all existing noise and air quality violations prior to any reconstruction of the freeway.
14. That MDOT secure all funding for the barriers--walls, landscaping, buffering, etc.—as well as funding for on-going maintenance of the barriers, before any highway approvals are given.

If the City Council concurs with the Commission's recommendation, the attached resolution is submitted for Your consideration, which, if adopted, would be forwarded to MDOT and other appropriate parties.

Respectfully submitted,

ARTHUR SIMONS, CHAIRPERSON



Marsha S. Bruhn, Director

Gregory Moots, Marcell Todd, and
Robert C. Davis, Staff

Attachment

7-26 cont.

BY COUNCIL MEMBER _____:

WHEREAS, the Michigan Department of Transportation (MDOT) identified I-94 as the freeway in greatest need for improvement in the 1990 Greater Detroit Area Freeway Rehabilitation Program Study; and

WHEREAS, MDOT subsequently initiated the I-94 Rehabilitation Project focusing on that portion of I-94 between Conner and I-96; and

WHEREAS, MDOT and Federal Highway Administration have prepared and submitted a Draft Environment Impact Statement (DEIS) for this project; and

WHEREAS, the DEIS describes the three (3) alternatives examined and sets forward the "Build Alternative" for consideration; and

WHEREAS, the "Build Alternative" involves a complete reconstruction of the freeway between Connor Rd. and I-96, with the new freeway being substantially wider and costing an estimated \$1.2 billion; and

WHEREAS, the "Build Alternative" would include (in each direction): four traffic lanes, an acceleration/deceleration lane (except within the interchanges), a three lane continuous service drive, and a 54.5 foot wide median reserved for future use, totaling over 300 feet in width; and

WHEREAS, there were areas of concern raised by the City Planning Commission regarding the design of the "Build Alternative", focussing on the center median, the interchanges, and the service drive; and

WHEREAS, concerns were expressed regarding noise impacts of the proposed expansion and the adequacy of noise barriers; and

WHEREAS, concerns were expressed regarding the environmental impacts of the proposed expansion, specifically pertaining to the emissions of trucks, the choice of the background level receptor for projecting CO concentrations, and meeting the ozone and particulate matter standards; and

WHEREAS, the proposed expansion would necessitate the taking of a significant number of properties; and

WHEREAS, there are areas that would be especially impacted by the proposed expansion, including Hendrie Street east of Woodward and the Fourth Street and Holden neighborhoods; and

WHEREAS, mass transit can reduce the number of vehicles using area roads and freeways, including the proposed I-94 expansion and can reduce air pollution through reduced vehicle trips; and

7-27

WHEREAS, neither mass transit alternatives nor the funding available for mass transit through federal construction mitigation funds seem to have been fully explored by MDOT as part the DEIS prepared; and

WHEREAS, there are various transit initiatives currently under study that include the Southeast Michigan Council of Governments' (SEMCOG) Metro Airport to Downtown Detroit rail study, CATA's (Capital Area Transit Authority) Lansing to Detroit rail study, the Detroit Regional Chamber's desire to establish with Detroit Renaissance and the Metropolitan Affairs Coalition a regional transit authority (Links) as well as a bus rapid transit system (SpeedLink), and SEMCOG's current efforts to develop a regional vision for mass transit; and

WHEREAS, transit in this region has for far too long been under-funded, under-implemented and not vigorously sought as one of the solutions to the region's mobility and congestion issues, problems associated with increased growth and development and the social and economic issues facing many of its citizens; and

WHEREAS, near-in suburbs and those lining the highway network are facing the impacts of improvement to that network, necessitated by a decaying and/or inefficient infrastructure, existing traffic congestion and projected future demand; and

WHEREAS, the climate we currently find ourselves in, with so much interest in new and improved transit, seems to present an opportunity for the city and suburbs to finally unite, cross the intrinsic barriers of class, race etc., and pursue and develop a regional transit agenda;

NOW, THEREFORE, BE IT RESOLVED, that the Detroit City Council does not support the proposed Build Alternative as presented, but recommends an alternative that would include the following elements:

1. Removal of the fifty-five foot wide center median.
2. The addition of lanes (through lanes and/or acceleration/deceleration lanes as needed).
3. The addition of 12 foot wide shoulders on one side only in each direction.
4. The addition of the continuous 30 to 36 feet wide service drives in each direction.
5. In conjunction with the continuous service drive concept, the creation of a street east of Woodward and parallel to the service drive for local traffic to protect the residences along Hendrie St.
6. Improvements to the interchanges to, at a minimum, remove the left-lane exit ramps and to create the continuous service drives.

7-27 cont.

7. Inclusion in the EIS of consideration for the impact of the proposed widening over the entire I-94 corridor from Wyoming to I-696 be prepared.
8. Inclusion in the EIS of consideration for the passenger-carrying capacity of a SpeedLink-style system down Gratiot, Michigan, and Grand River Avenues and rail connections between Detroit and Ann Arbor, Pontiac, Metro Airport, and Mt. Clemens when looking at the necessity for freeway expansion.
9. Inclusion in the EIS for consideration of the Detroit Intermodal Freight Terminal Study's impact on truck traffic on I-94.
10. Reduction in the spacing between the auxiliary lanes and mainline lanes as much as possible and the "tightening" of ramping geometrics in order to limit the taking of private property.
11. Special consideration given to the schools along the corridor for noise mitigation, and that they not be treated as residences in determining if noise barriers are justified.
12. A close examination of using flexible funding/mitigation of construction impacts monies to fund mass transit in the area.
13. That MDOT correct all existing noise and air quality violations prior to any reconstruction of the freeway.
14. That MDOT secure all funding for the barriers--walls, landscaping, buffering, etc.—as well as funding for on-going maintenance of the barriers, before any highway approvals are given.

AND, BE IT FURTHER RESOLVED, that a copy of this resolution and the foregoing report be forwarded to the Michigan Department of Transportation, the Federal Highway Administration, SEMCOG and others as appropriate.

7-27 cont.

Response 7-1

The DEIS (and Figure 2-1 of this FEIS) references I-94 project and traffic study limits. The I-94 project limits begin just east of the I-94/I-96 (Jeffries Freeway) interchange and extend 6.7 miles to just east of the I-94/Conner Avenue interchange. The project limits also include portions of M-10 and I-75, adjacent to I-94. The traffic study limits are broader than the project limits, extending along I-94 from Wyoming Avenue to I-696. The traffic limits were to be of sufficient length to identify operational issues within the corridor and test alternatives considered as part of the project.

This FEIS addresses the justification of the project limits as part of FEIS Section 2.3: Description of Project Limits. I-96 and Conner are the logical termini for this proposed improvement due to the three freeway-to-freeway system connections to I-94, critical links to the local and international economy, failure to meet current design standards, crash rates above the statewide average, elevated congestion levels compared to adjacent sections, and repairs recently made to adjacent sections.

This FEIS describes the alternative evaluation and selection process. Based upon comments from the public and project stakeholders, three modifications to the DEIS Build Alternative were developed following the DEIS Public Hearing held March 5-6, 2001. The Recommended Alternative for the corridor, described in Chapter 4, reduces the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each side from the DEIS Build Alternative) and eliminates the reserved space in the median, reducing the median width to approximately 38 feet (including shoulders and a concrete barrier). The cost of the Recommended Alternative (2004 dollars) is approximately \$1,181 billion.

Bridge and pavement rehabilitation projects are scheduled over the next several years within the southeast Michigan area. While most of these improvements do not include capacity improvements, this study and the I-75 study from M-102 to M-59 both recommend the consideration of additional lanes because of routine congestion and delays within the region. The capacity improvements within the I-94 project limits will benefit the local community, as well as the motoring public in conjunction with other projects planned in southeast Michigan.

Response 7-2

MDOT held a DEIS Public Hearing on March 5-6, 2001. Many concerns and questions regarding the project were answered or clarified at this Public Hearing. Responses to issues raised at the CPC Public Hearing are addressed in Responses 7-3 to 7-26.

Response 7-3

The DEIS and this FEIS attempt to succinctly present over ten years of project activities, including the process for identification and evaluation of project alternatives. The alternatives identified and evaluated as part of the study were the result of extensive coordination with the public, Interagency Coordination Committee (ICC), the city of Detroit, and other project stakeholders. The DEIS described all alternative transportation solutions that were considered from the beginning of the study up to preparation and circulation of the DEIS. The alternative process included both “illustrative” and “practical” alternative phases. As part of the illustrative process, a wide range of alternatives were identified based on public involvement and were presented to the ICC for its review and deliberation. Illustrative Alternatives included High Occupancy Vehicle (HOV) lanes and various service drive configurations, including a braided

ramp concept. These and other alternatives were eliminated from the study in the early stages because they did not meet the purpose and need of the study. The purpose of the I-94 Rehabilitation Project (from east of I-96 to east of Conner Avenue) continues to be the improvement of the condition and capacity of the existing I-94 roadway. The condition of the existing facility is the primary need for action. The condition and capacity problems have resulted in this section of I-94 being recognized in statewide and regional plans as the Michigan roadway section most needing action. The set of Practical Alternatives carried forward in the DEIS was a combination of independent alternatives and desirable elements from other alternatives. The Practical Alternatives were retained for further study in the FEIS; they included the No-Build Alternative, the Enhanced No-Build Alternative, and the DEIS Build Alternative. However, only the DEIS Build Alternative was determined to satisfy the purpose and need.

Following the publication of the DEIS, a DEIS Public Hearing was held March 5-6, 2001, in which public and agency comments were received on the DEIS. As a result of the input received, three modifications to the DEIS Build Alternative were developed to respond to the major concerns identified by these groups. All three modifications to the DEIS Build Alternative modified one or more components (service drives and/or median space) of the DEIS Build Alternative, and combined with the DEIS Build Alternative, offered all possible combinations of medians with and without reserved space, and two and three lane service drives. The cost of each modification to the DEIS Build Alternative was less than the DEIS Build Alternative and the modifications provided an intermediate design solution between the Enhanced No-Build Alternative and the DEIS Build Alternative. Chapter 4 contains information on the assessment of the alternatives.

Response 7-4

The Recommended Alternative for the corridor, described in Chapter 4, reduces the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each side from the DEIS Build Alternative) and eliminates the reserved space in the median, reducing the median width to approximately 38 feet (including shoulders and a concrete barrier). This equates to a standard section of I-94 with 12 lanes, at approximately 180 feet. As described in FEIS Section 7.1, the Recommended Alternative significantly reduces the number of residential and business displacements from that of the DEIS Build Alternative. East and west of the project limits, rehabilitation has already occurred and there are no plans to widen I-94 east or west of the project limits at this time.

This section of I-94 was chosen for this proposed improvement due to the crash rates above the statewide average, elevated congestion levels compared to adjacent sections, critical links to the local and international economy, failure to meet current design standards, three freeway-to-freeway system connections to I-94, and repairs recently made to adjacent sections.

Response 7-5

The Recommended Alternative proposes two-lane continuous service drives along the corridor, with the exception of a three-lane section eastbound from M-10 to I-75 on the south side of I-94 to address Wayne State University and the projected traffic demand. The service drives bordering the Art Center area are proposed with a three-lane cross-section. Some area will remain between the service drive and I-94 and will be landscaped as part of the project consistent with the Art Center Development Plan. City services will be able to operate along the service

drives and extensive coordination has occurred with the city of Detroit Mayor's office and City Council, as well as the Engineering and Traffic Engineering Departments in order to accommodate green space for the Art Center's plans and address the Hendrie Street resident's concerns. The Recommended Alternative will provide a local access road for the Hendrie residents, to provide a buffer between them and the service drive, see Figure 7-1.

Response 7-6

The Recommended Alternative for the corridor, described in Chapter 4, reduces the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each side from the DEIS Build Alternative) and eliminates the reserved space in the median, reducing the median width to approximately 38 feet (including shoulders and a concrete barrier).

Roadway level of service (LOS) is a stratification of travelers' perceptions of the quality of service provided by a facility. LOS is represented by the letters "A" through "F", with "A" generally representing the most favorable driving conditions (least congestion and driver delay) and "F" representing the least favorable (most congestion and driver delay). The MDOT considers LOS A through D desirable for Michigan roadways, but LOS E is acceptable in urban areas such as Detroit. I-94 currently operates at LOS E and F within the project limits during the peak travel times. The Recommended Alternative is expected to be LOS E or better during the AM and PM peak travel times along the freeway mainline and service drives. For LOS information by freeway segment, reference the *I-94 Rehabilitation Project Traffic Report, Volume III*.

Response 7-7

Discussions between the MDOT and City have been ongoing concerning the funding of the Recommended Alternative for the corridor. A mutually agreeable funding plan and schedule will be developed. This section of I-94 is a high priority for the state to address needs and safety.

Response 7-8

As described in FEIS Section 5.6.6.4, three noise barrier locations satisfy both the cost and acoustic components of the MDOT's 1996 noise abatement policy guidelines for feasibility and reasonableness and are proposed for the I-94 Rehabilitation Project. B3, B5, and B7 (in the southwest quadrant of the I-75/I-94 interchange and the northwest quadrant of M-10/I-94) are the proposed barrier locations (see Figure 5-11A). Noise barrier locations are committed by the MDOT to be re-evaluated prior to final design. The updated noise analysis handled schools as ten receptors per the MDOT and federal requirements and only the location at the Go Lightly school met the criteria for a noise barrier in the southwest quadrant of the I-75/I-94 interchange.

Response 7-9

The I-94 Rehabilitation Project will comply with all State and federal air quality laws and regulations. Recently, new more stringent diesel truck emission standards have been put into place that should significantly reduce diesel truck emissions in the future.

Response 7-10

Following the DEIS Public Hearing, held March 5-6, 2001, and receipt of public and agency comments on the DEIS, three modifications to the DEIS Build Alternative were developed to respond to the comments received. All three modifications to the DEIS Build Alternative scaled down one or more components (service drives and/or median space) of the DEIS Build

Alternative, and combined with the DEIS Build Alternative, offered all possible combinations of medians with and without reserved space, and two and three lane service drives. Adoption of the SEMCOG transit plan *Improving Transit in Southeast Michigan: A Framework for Action*, as mentioned above in Responses 3-6 and 3-7, reduced need to include a reserved space in the median, as I-94 was not chosen as a potential transit corridor.

The Recommended Alternative for the corridor, described in FEIS Section 4.4, reduces the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each one-way service drive from the DEIS Build Alternative). It also eliminates the reserved space in the median, reducing the median width to approximately 38 feet (two 14-foot shoulders and a 6- to 10-foot area for a concrete barrier). However, since there is still strong community support for a transit system in southeast Michigan, coordination with transit providers will continue to accommodate and encourage transit use in the future.

Response 7-11

The Recommended Alternative does not propose conversion of the east-west rail right-of-way north of I-94 that connects to the “Dequindre Cut” to a roadway.

SEMCOG adopted a transit plan entitled *Improving Transit in Southeast Michigan: A Framework for Action, October 2001*. This plan identifies a 12-corridor, 259-mile, transit system for Detroit. I-94 is not a part of that system. One component of that system from downtown Detroit to Metro Airport is currently under study. Coordination between the MDOT, DDOT, and SMART will continue to ensure that the I-94 rehabilitation project will accommodate and encourage bus service in the project area. The MDOT will pursue and encourage transit through federal funding and other sources. The formation of the Detroit Area Rapid Transit Authority (DARTA) will help further the needs of transit in the area.

Response 7-12

As stated in Response 7-4, the Recommended Alternative reduces the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each side from the DEIS Build Alternative) and eliminates the reserved space in the median, reducing the median width to approximately 38 feet (includes shoulders and a concrete median barrier). This reduction in width from the DEIS Build Alternative significantly reduces the number of residential and business displacements in the project section. Each additional section studied in the future will be assessed independently and consider the needs of the area. Additional lanes will not be added without a demonstrated need. The 6.7-mile segment between Conner Avenue and I-96 experiences significant congestion due, in part, to the close proximity of seven interchanges and several major traffic generators. The specific problems presented in this area contributed to the selection of the project termini. The proposed project will solve a number of specific problems and be useful even if no additional construction is planned.

As described in the FEIS Section 2.3, the proposed reconstruction of the project corridor would be of independent utility and significance and a reasonable expenditure even if no additional transportation improvements to adjacent sections of I-94 are made.

Response 7-13

The Recommended Alternative for the corridor eliminates the reserved space in the median and now only includes space for shoulders and a concrete median barrier. The displacement impacts were greatly reduced.

Response 7-14

Reconstruction of the roadway and bridges is included as part of the Recommended Alternative. The Recommended Alternative for the corridor eliminates the reserved space in the median and now only includes space for shoulders and a concrete median barrier. Property acquisition has been reduced as a result of removal of the median space.

Response 7-15

The Recommended Alternative proposes continuous service drives on the north and south sides of corridor for the entire length of the project, including the sections through the interchanges. The service drives would consist of two 11-foot through lanes and an 8-foot shoulder. The section between M-10 and I-75 on the south side of I-94, bordering Wayne State University, would consist of three through lanes due to increased traffic volumes. There are no additional impacts to properties in this three-lane section. The two lane continuous service drive mentioned south of Harper at Frontenac and Field will impact two properties.

Response 7-16

The right-of-way impacts for many of the locations listed in the comment have been reduced with the Recommended Alternative (RA). The design accommodates the purpose and need for the project, provides an updated safe roadway design, and minimizes impacts where possible. The Recommended Alternative potential displacements are listed in Table 5-7 and below is a list of locations from the comment:

- Along the south side of I-94 between Hamilton and Trumbull – No impacts with RA;
- Along the south side of Antoinette between Third and Cass – Nine impacts (four commercial and five residential) with RA;
- Along the south side of Hendrie between Brush and John R - Wayne County Maintenance Yard's two buildings impacted with RA;
- One unit of housing in the Fourth and Holder area – No impacts with RA;
- Woodbridge area - One home at 5287 Hecla impacted with RA;
- The industrial area north of I-94 between Mt. Elliott and the Conrail Railroad – No impacts with RA; and
- The residential area north of I-94 between Sherwood and Frontenac – Five residential impacts with RA.

Comments on the DEIS and the adoption by the SEMCOG General Assembly of the transit report *Improving Transit in Southeast Michigan: A Framework for Action, October 2001*, resulted in the study team considering a narrower cross-section than proposed for the DEIS Build Alternative. The narrower cross-section would reduce impacts on neighboring properties and minimize displacements. Since the I-94 corridor was not included in the transit report's 12-corridor, 259-mile recommended system, the reserved space in the median could be eliminated without adversely affecting future transit opportunities. In addition, the 2025 traffic analyses indicated that, in most locations, the three-lane service drives could be reduced to two-lane service drives and still have adequate capacity on the service drives. The result is a reduction in

proposed right-of-way width of about 19 feet on each side of I-94 for a total of 38 feet. A number of properties that were previously slated for acquisition are thus avoided.

Further narrowing of the proposed rights-of-way would not allow the addition of a general purpose traffic lane in each direction to accommodate current and anticipated future traffic volumes or the addition of weaving and acceleration-deceleration lanes to improve operations on the mainline of I-94. These additional lanes are also important to reducing traffic crashes and improving safety. Accommodation of current and future traffic volumes, together with improved operations and safety, are important elements of the purpose and need. Without these elements, the purpose and need would not be met.

Response 7-17

Comment acknowledged.

Response 7-18

The Recommended Alternative proposes 14-foot inside and 12-foot outside shoulders along the mainline of I-94. It should be noted that, due to the elimination of the reserved median space and the reduction of width along the service drives, I-94 remains on the existing roadway alignment. The benefit is an overall reduction in the potential property acquisitions. Provision of two shoulders meets MDOT and FHWA standards. The reason that the two shoulders in each direction are recommended is due to safety of vehicles needing to use them, and for maintenance of traffic within the corridor. The 14 feet would provide improved stopping-sight distance on horizontal curves and additional safety for motorists in accordance with AASHTO shoulder criteria for high-volume freeways that have a large percentage of truck traffic.

Response 7-19

The Recommended Alternative right-of-way impacts for the M-10 and I-75 interchanges are shown in FEIS Section 5.1.2 and represent a worst-case scenario. To accommodate all interchanges having right-hand side on- and off-ramps, a total of nine possible displacements are shown for the M-10 interchange and seven possible displacements for the I-75 interchange. During the design phase of the project, more detailed engineering will be completed for the interchanges and efforts will be made to refine the design and to further reduce impacts to adjacent properties at these interchanges.

Response 7-20

Comment acknowledged.

Response 7-21

The Recommended Alternative incorporates many of the suggestion of the City Planning Commission. Although the 55-foot median space has been removed with the Recommended Alternative, approximately 42 possible acquisitions are expected as part of the project. Based on the traffic volumes on I-94, a 12-foot to 14-foot shoulder is recommended for motorist safety on each side of the roadway per MDOT and FHWA standards. Two shoulders in each direction are recommended for the safety of vehicles needing to use them and for maintenance of traffic within the corridor. Both the preservation of aging housing stock for Detroiters and improving traffic flow conditions for regional transportation purposes are important goals of the project. The Recommended Alternative addresses both of these areas by significantly reducing right-of-

way impacts from that of the DEIS Build Alternative while still offering major improvements to local and regional traffic conditions

Response 7-22

Abatement of noise is being addressed as part of the Recommended Alternative. According to State and federal guidelines, barriers will be provided in locations that meet the MDOT's cost and acoustic criteria. Three noise-barrier locations satisfy both the cost and acoustic components of the MDOT's 1996 noise abatement policy guidelines for feasibility and reasonableness. The updated noise analysis for this FEIS considered schools as ten receptors according to the FHWA and MDOT policy. A noise barrier is recommended along the Go Lightly School property in the southwest quadrant of the I-75/I-94 interchange. The other school locations in the corridor did not meet the cost and acoustic criteria for a noise barrier. The project area also will be re-evaluated during the design phase. See FEIS Section 5.6 for the Noise Analysis and guidelines used for determining abatement.

Response 7-23

The possible negative consequences of traffic increases and expansion of the roadway are being addressed as part of this FEIS. The Environmental Justice and Indirect and Cumulative Effects analyses, contained in Chapter 5, discuss these issues.

As noted in Response 3-12, the air quality analysis conducted for the Recommended Alternative utilized the Linwood monitoring station, which is located in the city of Detroit and within the project corridor. Monitoring sites closer to the project area were used for the modeling conducted for this FEIS. All State and federal air quality laws and regulations will be followed. In the DEIS, the Linwood monitor had been malfunctioning, but it was available to use for the 2025 update of this FEIS. The Recommended Alternative meets the conformity for CO.

Response 7-24

There are no separate "construction mitigation funds" available from the federal government. New commuter and light rail projects typically are funded by the "New Starts" and Congestion Mitigation Air Quality programs. Those funds are committed separately from highway construction. The MDOT will pursue transit mitigation funds for routes to facilitate the movement of travel during construction. Partnerships and other forms of innovative financing can also be used as part of the project.

Response 7-25

The MDOT recognizes the critical roles of the City and SEMCOG in ensuring the success of the I-94 Rehabilitation Project and will continue to work with them, and other governmental agencies, to meet their goals and address any concerns that arise related to the project.

Response 7-26

The City Planning Commission's Recommendations have been incorporated in this FEIS with a few exceptions as noted below:

1. The 55-foot center median has been removed.
2. Additional through lanes and/or acceleration/deceleration lanes will be provided as needed.

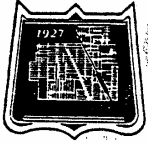

3. 14-foot inside and 12-foot outside shoulders are proposed for the I-94 mainline. Provision of two shoulders meets MDOT and FHWA standards. The reason that the two shoulders in each direction are recommended is due to safety of vehicles needing to use them, and for maintenance of traffic within the corridor. The 14-foot inside shoulders would provide improved stopping-sight distance on horizontal curves and additional safety for motorists in accordance with AASHTO shoulder criteria for high-volume freeways that have a large percentage of truck traffic.
4. Continuous service drives will be provided in each direction and will match existing widths of 30- feet, with the exception of one lane service drives through the interchanges, and a three lane eastbound service drive between M-10 and I-75.
5. A Hendrie Street local access roadway is provided for local traffic as shown on the conceptual design plan for the Recommended Alternative and can be found in Figure 7-1.
6. New interchanges will be constructed and will include removal of all left-hand ramps and continuous service drives will be provided.
7. The traffic impacts of the widening of the entire I-94 corridor from Wyoming to I-696 are analyzed in Traffic Reports Volume 1 through 3. This FEIS describes environmental impacts for only the project limits. Refer to Chapter 2 for a discussion of the project's Purpose and Need and Project Limits.
8. This FEIS does not specifically analyze passenger-carrying capacity of a Speed Link-style system or rail lines mentioned because I-94 was not included in the transit plan adopted by SEMCOG. This FEIS does consider accommodation of bus service in the I-94 corridor and will continue to work with DDOT and SMART to address bus operation and passenger service issues. Section 5.15 of this FEIS considers the indirect (secondary) and cumulative impacts of the I-94 Rehabilitation Project and its relation to other transportation improvement projects planned for southeast Michigan.
9. Chapter 2 contains a discussion of freight traffic in the I-94 Rehabilitation Project corridor. A detailed discussion of Detroit Intermodal Freight Terminal and its impact on I-94 truck traffic is contained in *Traffic Report Volume 3: Simulation of Year 2025 Conditions*.
10. Reduction of spacing between lanes and "tightening" of ramp geometrics has been included to reduce property impacts. Potential displacements have been reduced from the DEIS Build Alternative to approximately 42.
11. Schools are treated as ten receptors following the MDOT policy and a noise barrier is recommended for the southwest quadrant of the I-75/I-94 interchange.
12. MDOT will pursue funding to provide transit service during construction to assist with mobility in the area.
13. As part of the I-94 Rehabilitation Project, MDOT will provide noise abatement and correct any air quality violations in accordance with FHWA guidance.
14. Funding issues will be the subject of continuing discussions between the City and MDOT.

Response 7-27

The original Build Alternative was approximately 280 feet wide and the Recommended Alternative, with acceleration and deceleration lanes, is approximately 245 feet. The right-of-

way has been reduced, yet the alternative still meets the purpose and need. Three noise barriers will be provided where none currently exist today and the noise issue will be addressed during final design again. The Fourth and Holden neighborhood does not have any building displacements as the right-of-way was preserved as much as possible. The MDOT will pursue funding to provide transit service during construction to assist with mobility in the area. Please see Response 7-26 for the response to the 14 items listed.

Letter 8: City of Ferndale

<p>MAYOR CHARLES G. GOEDERT</p> <p>CITY COUNCIL CRAIG COVEY ROBERT G. PORTER JONATHAN M. WARSHAY HELEN MARIE WEBER</p> <p>CITY MANAGER THOMAS W. BARWIN</p>	<p>CITY OF FERNDALE</p> <p>300 EAST NINE MILE ROAD FERNDALE, MICHIGAN 48220-1797 TELEPHONE: (248) 546-2360 <i>ferndale-mi.com</i></p>	 <p>"GOOD NEIGHBORS"</p>
<p>March 28, 2001</p>		
<p>TO:</p>	<p>Senator Carl Levin Senator Debbie Stabenow Representative Sander Levin Representative David Bonior Governor John Engler Mayor Dennis Archer, City of Detroit Gil Hill, President, Detroit City Council Christine Whittman, United States Environmental Protection Authority Michigan Department of Environmental Quality Fred Skaer, Federal Highway Administration Jose Lopez, MDOT Paul Tait, SEMCOG State Senator Shirley Johnson State Representative Gilda Jacobs Dick Blouse, Greater Detroit Chamber of Commerce Vicki Kovari, MOSES Karen Kendrick-Hands, TRU</p>	
<p>FROM:</p>	<p>Thomas W. Barwin, City Manager </p>	
<p>SUBJECT:</p>	<p>Proposed \$1.3 Billion I-94 Expansion, Transportation Planning</p>	
<p>Mayor Charles Goedert and the Ferndale City Council have asked that I forward to you the enclosed Resolution adopted March 26, 2001. City Council, a growing coalition of organizations, churches and individuals in our area and I are strongly opposed to the proposed \$1.3 billion plan to expand a 6.7 mile stretch of I-94 in Wayne County, and related billion dollar road expansion projects.</p> <p>In summary, these plans are too large, too costly, are not coordinated with any regional mass transit plan and most importantly, will be a detriment to the quality of life in the region, while missing great community building opportunities. We are hopeful that our Resolution will be given serious consideration by all parties involved in Southeast Michigan's transportation decision-making process.</p> <p>Thank you for your interest and support on these vital transportation issues. We deeply appreciate any help and support you can provide toward restoring economic, social and physical vibrancy to Southeast Michigan and our urban areas.</p> <p>TWB/saa</p> <p>Enclosure</p>		

8-1

MAYOR
CHARLES G. GOEDERT

CITY COUNCIL
CRAIG COVEY
ROBERT G. PORTER
JONATHAN M. WARSHAY
HELEN MARIE WEBER

CITY MANAGER
THOMAS W. BARWIN

CITY OF FERNDALE

300 EAST NINE MILE ROAD
FERNDALE, MICHIGAN 48220-1797

TELEPHONE: (248) 546-2360

ferndale-mi.com



March 28, 2001

Mr. Jose A. Lopez, Public Hearings Officer
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Mr. Lopez:

Enclosed is a Resolution passed by the Ferndale City Council on Monday, March 26, 2001 expressing strong opposition to the \$1.3 billion I-94 expansion in Wayne County. Council has also asked for a 180-day extension of the public input process on this proposed project.

In summary, we believe the project is too large, too costly, and will be a detriment to regional and community development as planned. It is our Community's strong feeling that these major and costly road improvements cannot continue to go on without any coordination with the regional public transportation planning process now underway through the offices of SEMCOG.

We are hopeful that our Resolution will be given serious consideration by the parties involved in the transportation decision making process. The size and scope of the I-94, I-75, I-375 and other southeast road expansion projects are among the most important and capital intensive decisions that will dictate our region's future quality of life for generations to come.

Sincerely,

Thomas W. Barwin
City Manager

TWB/saa

Enclosure

8-2

CITY OF FERDALE**RESOLUTION****Opposing \$1.3 Billion I-94 Expansion Plan
Request Extension of Public Comment Period**

Moved by Councilman Warshay, seconded by Councilman Covey, to adopt the following Resolution:

Transportation planning decisions are among the most important decisions our system of Federal, State and Local governments collectively make on behalf of our communities; and

Sound transportation planning procedures should also encourage input on transportation planning strategies and decisions from the general public and local governments impacted by those decisions, as transportation decisions are vital to a community's environment, quality of life and economy; and

The costs of transportation systems represent a significant portion of federal, state and local budgets and directly and indirectly dictate the future growth, investment and development patterns and quality-of-life viability of a region impacted by important transportation decisions and subsequent investments, and also to be noted is that personal transportation costs average 18% of a family's income, second only to housing costs; and

For these reasons, the City Council of the City of Ferndale, Michigan requests that the period for essential public comment on the I-94 expansion plan be extended by 180 days to allow for additional public and local government input and to allow for planning the future of I-94 in conjunction with SEMCOG's regional public transportation planning process now underway and scheduled to be completed no later than October 2001; and

With the current public input period now scheduled to end on March 27, 2001, the City of Ferndale objects to the \$1.3 billion I-94 expansion plan for the following reasons:

- 1) The current plan to expand a six mile span of I-94 at a cost of \$1.3 billion to enlarge the segment to a 20-lane configuration is financially and spatially exorbitant; and
- 2) The failure to coordinate the \$1.3 billion road investment with any current or ongoing public transportation alternatives is shortsighted, poor public policy and likely to result in a tremendous waste of taxpayer resources; and
- 3) The current I-94 plan will add significantly to the noise, air and storm water pollution in the immediate vicinity of the roadway, aggravating the health of a community where its children suffers from asthma rates at three times the national average, and billions in Great Lakes water quality improvement mandates; and

8-3

8-4

-2-

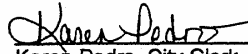
- 4) The current I-94 plan will aggravate urban sprawl, disinvestment from the central city and older suburbs, and does nothing to help those who may not have private transportation options, specifically low and moderate income individuals, the disabled, elderly and youth to get to employment, medical, educational, recreational or entertainment centers; and
- 5) The current plan does not meet any desirable regional aesthetic, community or neighborhood revitalization goals and will further divide communities and continue the practices which have made Metro-Detroit one of the most racially and economically segregated regions in America; and
- 6) The current plan will likely drain resources from improving other methods and alternative routes for moving goods and commerce; and
- 7) From City Council's experience in Ferndale, studies, and visits to other vibrant Metropolitan areas in North America, we truly believe that less expensive, faster, cleaner and fairer alternatives could be designed and implemented more aligned with the environmental, economic, quality of life and community improvement goals and vision that a growing coalition of Metro-Detroit citizens share; and
- 8) The current I-94 plan and Southeast Michigan's current transportation strategy works against our national, state and local interest by continuing to increase our dependence on mid-east oil, at a time when sound public policy dictates that public investments provide reliable mass transit backbones in urban areas, which lessen our dependence on mid-east oil and gas.

8-4 cont.

Therefore, we the City Council of the City of Ferndale, voice our opposition to the I-94 expansion plan and direct City staff to forward a copy of this Resolution to the Federal Highway Administration, the Michigan Department of Transportation, SEMCOG, Governor John Engler, the City of Detroit, United States Senator Carl Levin, United States Senator Debbie Stabenow, Congressman Sander Levin, the Environmental Protection Agency, the Michigan Department of Environmental Quality, State Representative Gilda Jacobs, State Senator Shirley Johnson, MOSES, TRU and other interested local governments.

AYES: Council Members Covey, Porter, Warshay, Weber, Mayor Goedert
 NAYS: None
 ABSENT: None
 MOTION CARRIED

I, Karen Pedro, City Clerk of the City of Ferndale, do hereby certify that the foregoing is a true and compared copy of a Resolution duly made and passed by the Ferndale City Council at a meeting held March 26, 2001.


 Karen Pedro, City Clerk

Response 8-1

The I-94 Rehabilitation Project plans are estimated at \$1.181 million and are costly due to the urban section, since the area is developed, and the nature of the proposed improvements. The improvement includes an additional mainline lane, redesign and reconstruction of all interchanges east of I-96 to east of Conner Avenue, creation of continuous service drives, reconstruction of all bridges and cross streets, and rebuilding of all pedestrian facilities to meet Americans with Disabilities Act standards. The Recommended Alternative is not anticipated to deter other transportation improvements or community and regional development plans and is consistent with SEMCOG's transit vision for the region and I-94 is not one of the designated corridors. Discussions concerning the project have been ongoing among the MDOT staff, city of Detroit, SEMCOG, Wayne County, and other governmental agencies and community stakeholders. The Recommended Alternative has been coordinated with all agencies regarding regional transportation planning.

Response 8-2

The 180-day extension was not provided, but the official comment period included 24 days before the public hearings and 66 days following the hearings, for a total of 90 days. The official comment period met and exceeded all applicable requirements. The I-94 Rehabilitation Project plans are costly due to the urban section in which it is located and the nature of the proposed improvements. The improvements include an additional mainline lane in each direction, redesign and reconstruction of all interchanges from east of I-96 to east of Conner Avenue, creation of continuous service drives, reconstruction of all bridges and cross streets, and rebuilding of all pedestrian facilities to meet ADA standards. The Recommended Alternative is not anticipated to deter other transportation improvements or community and regional development plans and is consistent with SEMCOG's transit vision for the region. This study is a part of the SEMCOG 2030 Regional Transportation Plan which recognizes the need for a multi-modal transportation plan that serves all segments of the population and economy.

Response 8-3

The DEIS public hearings were held March 5–6, 2001. The official comment period included 24 days before the public hearings and 66 days following the hearings, for a total of 90 days. The official comment period met and exceeded all applicable requirements. Other opportunities to comment were available through a program of public involvement activities. An extensive public outreach program has been included since the project's inception in September 1994. As noted at the beginning of this chapter, over 100 meetings have occurred with the public and project stakeholders. The public outreach program has included: an Interagency Coordination Committee and Citizens Advisory Committee; Focus Studies; a Citizens Impact Survey; Public Hearings and Hearings before the City Council and Planning Commission; numerous stakeholder meetings; a website, project email and hotline; and a project office, among other opportunities for involvement.

As described in Response 3-8, the Recommended Alternative for the corridor consists of a significantly narrower footprint than the DEIS Build Alternative. The Recommended Alternative is not anticipated to deter other transportation improvements or community and regional development plans and is consistent with SEMCOG's transit vision for the region. Discussions concerning the project have been ongoing among the MDOT staff, city of Detroit, SEMCOG, Wayne County, and other governmental agencies and community stakeholders.

Response 8-4

(1) The Recommended Alternative narrows the I-94 cross-section from that of the DEIS Build Alternative by approximately 38 feet and reduces the project cost from approximately \$1.49 billion to \$1.18 billion (in 2004 dollars). The cost of the project is documented in Section 4.7 of this FEIS and is in line with similar projects of this magnitude.

(2) The project has considered all applicable local and regional transportation plans from the Southeast Michigan Council of Governments.

(3) All environmental impacts of the I-94 Rehabilitation Project are documented in this FEIS in accordance with the applicable State and federal laws and regulations. As described in Section 5.6 of this FEIS, three noise barrier locations satisfy both the cost and acoustic components of the MDOT's 1996 noise abatement policy guidelines for feasibility and reasonableness and are proposed for the I-94 Rehabilitation Project. Noise barrier locations are committed by the MDOT to be re-evaluated prior to final design. Mitigation measures will be put in place during construction to address noise pollution. SEMCOG's regional analysis performed for the TIP incorporated the effects of this project and satisfied the regional requirements set forth in the Final Conformity Rule. The SEMCOG conformity analysis was submitted and approved by USEPA. The project is not predicted to cause or exacerbate a violation of the CO standards. Mitigation measures will be put in place during construction to limit project impacts on air quality. The project is not expected to negatively impact water quality. The new drainage system included as part of the project features inline detention and will improve the water quality and meter the flow.

(4) The Recommended Alternative is expected to encourage investment in the central city by addressing infrastructure and capacity needs, increasing access, and improving mobility. The Indirect and Cumulative Effects analysis for the project is provided in FEIS Section 5.15. Section 5.1.4 of this FEIS provides the Environmental Justice analysis for the Recommended Alternative and describes expected improvements for community facilities and services, neighborhood cohesion, and non-motorized mobility within the corridor.

(5) While the original construction of I-94 contributed to a physical separation of what is now the north and south sides of the freeway, the current I-94 Rehabilitation Project will not exacerbate this separation. All expected environmental, social, and economic impacts of the project are documented in Chapter 5. The I-94 Rehabilitation Project has included an extensive public involvement component and extensive coordination with governmental and community stakeholders to discuss topics such as aesthetics and development goals. The series of Context Sensitive Solutions workshops held in February 2004 is an example of the efforts that have been underway. A summary of the workshops is provided in Appendix G. Refer to Chapter 8 for a description of the public and agency coordination.

(6) The importance of I-94 to moving goods and commerce is documented in Chapter 2. The current plan is consistent with all applicable plans related to moving goods and commerce and is an integral part of the State's Long Range Plan.

(7) The levels of service for the freeway mainline are anticipated to operate at Level of Service E or better for the I-94 mainline in the peak hours of the weekdays.

Following the DEIS Public Hearing, held March 5-6, 2001, and receipt of public and agency comments on the DEIS, three modifications to the DEIS Build Alternative were developed to

respond to the comments received. All three modifications to the DEIS Build Alternative scaled down one or more components (service drives and/or median space) of the DEIS Build Alternative, and combined with the DEIS Build Alternative, offered all possible combinations of medians with and without reserved space, and two and three lane service drives. Adoption of the SEMCOG transit plan *Improving Transit in Southeast Michigan: A Framework for Action*, as mentioned above in Responses 3-6 and 3-7, reduced need to include a reserved space in the median. There is no bus rapid transit or rail alternatives proposed in the SEMCOG plan in the I-94 corridor and none were identified to attract enough riders in this FEIS analysis either.

The Recommended Alternative for the corridor, described in FEIS Section 4.4, reduces the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each one-way service drive from the DEIS Build Alternative). The Recommended Alternative also eliminates the reserved space in the median, reducing the median width to approximately 38 feet (two 14-foot shoulders and a 6- to 10-foot area for a concrete barrier). However, since there is still strong community support for a transit system in southeast Michigan, coordination with transit providers will continue to accommodate and encourage transit use in the future.

(8) Comment acknowledged.

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Letter 9: U.S. Congressman John Conyers Jr., Detroit

<p>JOHN CONYERS, JR. 14TH DISTRICT, MICHIGAN</p> <p>COMMITTEE: RANKING MEMBER JUDICIARY</p> <p>SUBCOMMITTEE ON COURTS AND INTELLECTUAL PROPERTY</p> <p>SUBCOMMITTEE ON THE CONSTITUTION</p>	<p>Congress of the United States House of Representatives Washington, DC 20515-2201</p>	<p>WASHINGTON OFFICE: 2425 RAYBURN HOUSE OFFICE BUILDING WASHINGTON, DC 20515-2201 PHONE: 202-225-5126</p> <p>DETROIT OFFICE: 608 FEDERAL BUILDING 231 W. LAFAYETTE DETROIT, MI 48201 PHONE: 313-981-1111</p> <p>E-MAIL AND WWW: JOHN.CONYERS@MAIL.HOUSE.GOV HTTP://WWW.HOUSE.GOV/CONYERS</p>
<p>May 11, 2001</p>		
<p>José A. López, Public Hearings Officer Bureau of Transportation Planning Michigan Department of Transportation P.O. Box 30050 Lansing, MI 48909</p>		<p>Via Facsimile (517) 373-9255</p>
<p>Dear Mr. López:</p>		
<p>This letter regards the Draft Environmental Impact Statement (DEIS) for the "I-94 Rehabilitation Project". A number of citizen groups and one governmental representative from the City of Ferndale have brought to my attention their concerns about this highway expansion project. (Please see the attached letter.) In addition, members of my staff have attended several meetings on or related to this topic. I understand this has been a controversial project and that MDOT has the difficult task of balancing transportation needs and responses with the concerns and needs of the community. However, I find many of the citizen concerns to be valid and I therefore urge you to give all of their points serious consideration.</p>		<p>9-1</p>
<p>While I recognize that the I-94 corridor needs rebuilding, I am particularly concerned about the magnitude of the recommended Build Alternative, corresponding air quality issues, environmental justice concerns, and Metro Detroit's need for improved and expanded mass transit options.</p>		<p>9-2</p>
<p>MDOT's "5 Year Road & Bridge Program, Vol. III - 2001 to 2005" states on page 81 that the I-94, I 96 to Conner Avenue research project is "the first phase of a larger project to rehabilitate two projects; I-94 between Wyoming Avenue in the city of Detroit and I-696 in Macomb County." Thus, it appears the DEIS for this immense segment does not address the entire scope of the I-94 rehabilitation plans, which would eventually extend into Harper Woods and beyond. Chapter 9 of the DEIS does not list Harper Woods or the City of Grosse Pointe Woods as recipients of DEIS materials.</p>		<p>9-3</p>
<p>The attached letter raises various air quality issues that may have serious consequences for community health and Detroit's air quality status under clean air laws. Environmental justice concerns such as the health, noise, and social impacts on local neighborhoods, the service drive sidewalks next to potentially speeding local traffic, and the unclear status of pedestrian overpasses also merit serious attention. (In a meeting with congressional staff, MDOT, and SEMCOG and representatives from Parsons Brinckerhoff, Inc., congressional staff was told that</p>		<p>9-4</p>

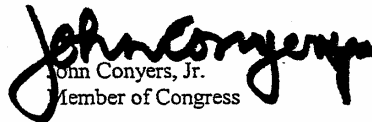
Letter to Mr. José López
May 11, 2001

the pedestrian overpasses would be planned later on a case-by-case basis. Thus neighborhood and Wayne State University campus connectivity appear to be in jeopardy.)

Finally, committing such incredible resources to this particular road project before a regional transit plan has been developed concerns me especially given that one third of Detroit households do not have a car and most recent job creation has occurred in the suburbs. (The DEIS mentions the possibility of putting light rail in the median of I-94, but there are no current plans/studies that I am aware of that contemplate light rail in the I-94 corridor. Also, putting light rail in the middle of a highway corridor does not afford maximum opportunities for economic benefits to the local community.)

For all the reasons stated above, I respectfully request that MDOT seriously address the issues brought to my attention in the attached letter and any additional issues raised here. I commend you for your hard work and patience. I look forward to working with you in maintaining and improving Michigan's transportation infrastructure.

Sincerely,


John Conyers, Jr.
Member of Congress

cc: James J. Steele
Division Administrator, Federal Highway Administration

9-5



Transportation Riders United [TRU]

A coalition to advocate for transportation access and mobility in southeastern Michigan

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Comments on the Draft Environmental Impact Statement for the I-94 Rehabilitation Project, FHWA- MI-EIS-01-01-D

May 11, 2001

James J. Steele
Division Administrator
Federal Highway Administration
315 West Allegan Street, Room 211
Lansing, MI 48933
(517) 377-1844 x55
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Jose A. Lopez, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909
(517) 373-9534
Fax: (517) 373-9255
e-mail: lopezjos@mdot.state.mi.us

Dear Sirs:

We, the undersigned 17 organizations, are filing joint comments that document our concerns with the Draft Environmental Impact Statement [DEIS] for the "I-94 Rehabilitation Project."

We oppose the "Build Alternative" (hereafter called the expansion alternative) as described by the DEIS. The "expansion alternative" consists of room for 24 traffic lanes and will have a staggering pricetag of \$1.3 billion for the 6.7-mile segment. This is about \$20 million per block. This alternative will increase our dependency on autos and trucks. It provides for a dangerous lack of diversity in our transportation investment. The "expansion alternative" is not in the best interest of the public trust.

This project defines a crossroad regarding the future of Southeast Michigan's transportation system. Do we continue to pour billions of dollars into new and wider highways, or do we steer Southeast Michigan in a better direction?

We, the undersigned organizations know that the better direction for this project is to diversify our transportation investments by investing in congestion-fighting transit options in our urban areas. Transit will add vitality to the City. The "expansion alternative" will suck vitality away from the project area.

We propose that the following reasonable alternative be made the preferred alternative for this project:

- Rehabilitate I-94 to its original design. This addresses the immediate need to fix the deteriorating condition of pavement and bridges. It is a more honest "rehabilitation." It doesn't render obsolete all of the construction with the associated traffic-delay cost that have plagued this vital I-94 corridor for years.
- Reduce posted speeds along this 6.7-mile section to maximize the capacity, reduce noise, reduce pollution, reduce crashes and improve energy efficiency.

9-6

9-7

9-8

Jose A. Lopez
May 11, 2001
Page 2

- Further add transportation capacity along the corridor by investing in a modern commuter rail system with lines to serve Ann Arbor, Detroit and Mount Clemens. An additional line to Pontiac would offer an alternate to I-75 commuters who use I-94 to access areas of Central Detroit. Per SEMCOG data, a modern 3-line commuter rail system would cost about \$200 million, equivalent to the cost budgeted for traffic control during construction of the "expansion alternative."
- Further add transportation capacity along the corridor by investing in SpeedLink Bus Rapid Transit along Gratiot to Eastland, Grand River to City Limits and Michigan to Dearborn. These three lines, consisting of about 32 miles, would cost about \$385 million to establish based on SEMCOG's Transit Vision Forum during January 2001.

9-9

This alternative would meet the purpose and need of the proposed project, cost significantly less than the "expansion alternative" and meet the goals of the project as outlined below:

- Provide needed mobility along the corridor for all people and freight
- Enhance the potential for economic development within the City of Detroit and the study area.
- Result in beneficial social, environmental, and economic improvements to the host neighborhoods and the City of Detroit.
- Significantly reduce taxpayer investment while strengthening our transportation infrastructure through diversification.

9-10

Additional comments on the DEIS

This "expansion alternative" will have staggering adverse impacts to the human and natural environment on both the local community and the region. In addition, this alternative will be the most expensive road building projects in the state's history.

9-11

MDOT's "expansion alternative" is really 3 projects in one; the expansion of the main line, creation of the central median space, and creation of continuous service drives. MDOT intends to build these three projects three times in the I-94 corridor, Wyoming to I-96, I-96 to Conner (the current DEIS) and Conner to I-696. The project proposed in the current DEIS cannot be a successful stand-alone project and the other two segments need to be included to determine the cumulative impacts for the project. The DEIS has not addressed the cumulative impacts for the full project.

9-12

We challenge the scoping process that led to the study of only one segment of a larger much more damaging project (a proposed expansion of I-94 between Wyoming Ave in Detroit and I-696 in Macomb County.) Either the plan is to expand I-94 both east and west of this initial segment and it is segmentation, or it is not. The community needs to know what they are getting into if they say yes to this project.

9-13

In addition, nothing is provided in the DEIS to justify the expansive service drives proposed, the real need for the additional capacity of I-94, and the need for the space in the middle.

9-14

Jose A. Lopez
May 11, 2001
Page 3

Where the DEIS goes beyond assertions and provides data such as on the projected level of service information provided, the "expansion alternative" is clearly excessive design even without the extra space in the middle for future expansion.

The proposed I-94 expansion project raises many crucial issues about appropriate scale and capacity of urban freeways, funding priorities for public transportation as well as roads within this corridor, congestion management during construction, usurpation of irreplaceable urban rail corridors, maintenance of air quality standards, mobile contributions to urban air toxics and environmental justice concerns, just to name a few. The DEIS does not provide acceptable or adequate answers.

We find the analysis and discussion of the purpose and need, project justification, air quality and noise impacts, environmental justice concerns, cumulative impacts of and alternatives to the proposed expansion to be woefully inadequate. Taken as a whole, the DEIS understates the adverse environmental impacts, ignores reasonable alternatives, and overstates both the need for and the economic benefits of this project.

Some specific technical issues that need addressed include:

1. **Air Quality violations are concealed:** Without any explanation, MDOT has used air quality data from a suburban air monitor to under-predict the air pollution impacts from this massive expansion. If MDOT had used Detroit-based data it would be obvious that the "expansion alternative" will violate health-based national air quality standards for carbon monoxide (CO). In addition, since the DEIS indicates that truck traffic will increase faster than automobile traffic, using default model inputs on vehicle mix is inappropriate.
2. **The DEIS does not address the new standards for fine particulate matter (PM 2.5) and Ozone.** The DEIS does not address the fact that under the Air Quality Standards recently upheld by the US Supreme Court, the air in the corridor is unhealthy (does not meet attainment requirements) for both PM 2.5 and Ozone, major air pollutants from car and truck emissions. Building the "expansion alternative" violates clean air laws because it is designed to increase air pollution emissions from cars and trucks in an area where the air is already unhealthy.
3. **Air Toxics are not addressed:** The Draft Environmental Impact Statement is totally silent about the increase in toxic pollutants during construction and from the increased truck traffic. Likewise, there is no discussion of the impact of mobile source toxics on human health or on the Great Lakes ecosystem due to air deposition.
4. **No provision has been made to install aftermarket emission controls on diesel construction equipment.** Regardless of the ultimate scale of the I-94 rebuild, aftermarket emission controls (including particle traps) on all construction equipment must be required.
5. **The DEIS ignores the link between increased highway traffic and health.** Detroit's children suffer from asthma at three times the national average. The Journal of the American Medical Association reports that traffic controls imposed during the Atlanta Olympics decreased morning peak traffic counts by 23%. During this period, Medicaid-related emergency room visits and hospitalizations

9-15

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Jose A. Lopez
May 11, 2001
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- for asthma dropped by 42%. The DEIS for I-94 ignores transit and rail alternatives that could reduce traffic and the pollution it causes.
6. **The "expansion alternative" will result in more crashes and higher injury rates than maintaining the current design of I-94.** A detailed review of the crash statistics in the DEIS shows that the crash rate along I-94 in the project area is 305 per 100,000 vehicles traveled (mvm). This rate is lower than the regional average of 350 crashes. Higher crash rates within the study area occur, not along I-94 but along I-75 and the Lodge where the lanes have been expanded. Thus it is very likely that the expansion will lead to a worse crash rate. The current design of I-94 is safer than the "expansion alternative."
 7. **The international trade route rationale does not withstand close scrutiny.** MDOT has asserted that importance of I-94 overall to commerce and international trade. Nevertheless, this particular segment of I-94 is not key to the potential connections between Canada and Chicago, Fort Wayne, or Toledo. For traffic using the Blue Water Bridge between Port Huron and Sarnia, I-69 is the primary link between Canada and the west and south. This segment of I-69 is underutilized and for the most part does not pass through urban areas in Michigan. Traffic using the Ambassador Bridge to and from Canada will primarily travel I-94 west of I-96 and never use the segment discussed in the DEIS. The 6.7 segment east of I-96 is not critical to this network.
 8. **MDOT's response to environmental justice concerns is an insult.** MDOT is touting sidewalks immediately along the curb of the service drives where no one wants to walk because of the fast traffic, pollution and noise. At the same time, it appears that the pedestrian overpasses that link communities across the expressway will be removed and not replaced, thus pedestrian access will actually be worsened.
 9. **Space saved in the median for 'possible future transit' is unlikely to be effective in the future.** Light rail doesn't belong among 10 lanes of interstate traffic. Space "maybe for transit" is a ruse to create more space for truck lanes.

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I-94 desperately needs to be rebuilt, but the "Expansion Alternative" cannot be justified economically, environmentally, or socially. In addressing the capacity needs of this corridor, there is the opportunity to increase the vitality of the City, not to continue to drain it.

We recommend abandonment of the "Expansion Alternative" and preparation of a supplemental DEIS that better addresses the concerns enumerated herein. Consistent with state-of-the-art transportation systems in all vibrant cities, rely on transit to increase capacity in the corridor. Use SEMCOG's transit vision, and an intermodal traffic analysis model. This project is too important to ignore the reasonable alternative as outlined at the beginning of this letter.

9-26

Sincerely,

Karen D. Kendrick-Hands
President
Transportation Riders United
On behalf of:

05/11/2001 11:33 313553576 HANDS & ASSOCIATES PAGE 03	
<p>Jose A. Lopez May 11, 2001 Page 5</p>	
<p><i>On behalf of</i> Michigan Land Use Institute Arlin Wasserman</p>	<p>Michigan Association of Rail Passengers John D. DeLora, Executive Director</p>
<p>City of Ferndale Tom Barwin, City Manager</p>	<p>League of Women Voters, Detroit Metropolitan Area Carolyn Buell, President</p>
<p>Sierra Club, Mackinac Chapter Bob Duda, Southeast Michigan Group Chairman</p>	<p>Lung Association of Michigan Elliot Levinsohn, Manager, Air Quality and Environmental Health</p>
<p>East Michigan Environmental Action Council Ms. Libby Harris, Director</p>	<p>Friends of Detroit River Jane Mackey, Chair</p>
<p>League of Women Voters of Dearborn/Dearborn Heights Elizabeth Linick, President</p>	<p>Environmental Law and Policy Center Ann Spillane, Sr. Attorney</p>
<p>Southwest Detroit Environmental Vision Billie Hickey, Interim Director</p>	<p>Riverfront East Alliance Bob Jackman, President</p>
<p>Michigan Environmental Council Lana Pollack, President</p>	<p>Ecology Center of Ann Arbor Jeff Gearhart, Campaign Director</p>
<p>Hamtramck Environmental Action Team, (HEAT) Rob Cedar</p>	<p>Public Interest Research Group of Michigan Brian Imus, Campaign Director</p>
<p>Dr. Eugene Perrin Individual</p>	<p>Citizens for Buses Harold Leese</p>
<p>Bill Houghton Individual</p>	<p>Vic Randall Individual</p>

Response 9-1

Comment acknowledged. As part of this FEIS, citizen and stakeholder group comments regarding the I-94 Rehabilitation Project are addressed. Following the DEIS Public Hearing, held March 5-6, 2001, and receipt of public and agency comments on the DEIS, three modifications to the DEIS Build Alternative were developed to respond to the comments received. All three modifications to the DEIS Build Alternative scaled down one or more components (service drives and/or median space) of the DEIS Build Alternative, and combined with the DEIS Build Alternative, offered all possible combinations of medians with and without reserved space, and two and three lane service drives. The Recommended Alternative is also consistent with the SEMCOG transit vision. Responses to this letter are provided by Response 9-6 through 9-26.

Response 9-2

The Recommended Alternative for the corridor, described in Chapter 4, reduces the footprint of the project by reducing the service drives to two 11-foot through lanes with an 8-foot shoulder (a 10-foot reduction in width on each side from the DEIS Build Alternative) and eliminating the reserved space in the median, reducing the median width by approximately 17 feet to approximately 38 feet (includes shoulders and a concrete barrier). As described in FEIS Section 7.1, the Recommended Alternative significantly reduces the number of residential and business displacements from that of the DEIS Build Alternative. This reduction of impacts was a direct result of comments received through public participation activities. All issues related to air quality and environmental justice are discussed in sections 5.5 and 5.1–5.2 respectively.

SEMCOG's regional analysis performed for the TIP incorporated the air quality effects of this project and satisfied the regional requirements set forth in the Final Conformity Rule. The SEMCOG conformity analysis was submitted and approved to USEPA. The project is not predicted to cause or exacerbate a violation of the CO standards. Mitigation measures will be put in place during construction to limit project impacts on air quality.

The I-94 Rehabilitation Project Recommended Alternative will address national, regional, and local mobility needs. When compared to the DEIS Build alternative and its three modifications, it will have the least impact on the Environmental Justice population, displacing fewer residents and businesses. The Recommended Alternative offers many advantages when compared to the No-Build and Enhanced No-Build Alternatives, including continuous service drives with the potential to connect the community, provide for development, and facilitate bus service. The pedestrian-only crossings will be safer than those that exist today, since they will go over the continuous service drives and the I-94 freeway mainline.

Response 9-3

The "5 Year Road and Bridge Program, Vol. VI -2004 to 2008" does indicate that I-94 between Wyoming and I-696 is a capacity needed project and that the design has been deferred pending identification of additional funding. In fact, all of I-94 in Michigan is in need of rehabilitation and modernization according to the Michigan Department of Transportation State Long Range Plan 2000 – 2025. Currently, 35 percent of the miles traveled on I-94 are under congested conditions and that is expected to increase to 42 percent by 2025. According to the MDOT Long Range Plan, all of I-94 in Michigan will need additional capacity and will require at least three lanes in each direction, with some urban locations needing four lanes. The project section

of I-94 from I-96 to Conner Avenue has experienced some of the worst congestion, and combined with the age of the facility, as well as its poor condition, elevated this section to a top priority on I-94.

In 2002, I-94 underwent rehabilitation between Conner Avenue and Metropolitan Parkway including resurfacing of the pavement and rehabilitating 51 bridges. Any further action on this section is not expected for a number of years. The need for additional capacity will be addressed in the future when further action is warranted, and development trends and traffic growth have further evolved.

The rehabilitation of I-94 from I-96 to Conner Avenue makes full use of the existing alignment and right-of-way and addresses the specific problems that occur in that section. It will not dictate what will happen further east or west. Those sections will be evaluated on their own merits, and a suitable recommendation will be developed accordingly. The I-96-to-Conner section will be independently useful and will not limit future options on adjacent sections.

Response 9-4

Responses to the concerns raised in the attached letter are provided by Responses 9-6 through 9-26.

Response 9-5

Project costs for the I-94 Rehabilitation Project are costly due to the urban section in which it is located and the nature of the proposed improvements. The improvement includes an additional mainline lane, redesign and reconstruction of all interchanges from east of I-96 to east of Conner Avenue, creation of continuous service drives, reconstruction of all bridges and cross streets, and rebuilding of all pedestrian facilities to meet ADA standards. The Recommended Alternative is not anticipated to deter other transportation improvements or community and regional development plans and is consistent with SEMCOG's transit vision for the region published in October 2001. I-94 was not included in the 12-corridor, 259-mile system. The I-94 Rehabilitation Project is a part of the SEMCOG Regional Transportation Plan which recognizes the need for a multi-modal transportation plan that serves all segments of the population and economy.

Response 9-6

As described in Chapter 2, the project portion of the I-94 Rehabilitation Project is a critical section of the National Interstate and Defense Highway System: It consists of two major freeway-to-freeway interchanges and five interchanges with local arterial streets in the city of Detroit. I-94 is a major connector to downtown Detroit and international trade routes. The project portion of I-94 was constructed in the 1940s and early 1950s and requires frequent maintenance due to aging pavement, bridges and other infrastructure. The need for rehabilitation of the project portion is further supported by the outdated design that includes left-on and left-off ramps and insufficient acceleration and deceleration lanes, thereby resulting in safety and operational problems, and insufficient capacity to meet 2025 traffic demand projections for automobiles and heavy vehicle traffic. The project currently is listed as the top priority for the Michigan Department of Transportation in its State Long Range Plan for 2000-2025 and is only one of a number of interstate improvement projects planned by the State. The Rehabilitation of I-94 is consistent with SEMCOG's transit vision for the region, provides accommodation for certain transit elements, and does not propose to impede the development of a mass

transportation system in southeast Michigan. This project is part of a multi-modal transportation plan for southeast Michigan and all modes are needed to meet the transportation needs of the region. The project will contribute to the vitality of the city of Detroit and Southeast Michigan. The Recommended Alternative is expected to encourage investment in the central city by addressing infrastructure and capacity needs, increasing access, and improving mobility. I-94, from I-96 to Conner is a critical link for regional and international freight traffic and so improvements in this section will contribute to the local and regional economies.

Response 9-7

Rehabilitating I-94 to its original design will not correct the safety and operational problems caused by its outdated design, address capacity needs to meet 2025 traffic demand projects, separate local traffic and improve neighborhood circulation, improve non-motorized facilities, or improve system connectivity. Rehabilitation of I-94 in its original design would only address pavement conditions and would not address safety or congestion issues.

Response 9-8

The posted speed limit along I-94 is 55 mph which, according to AASHTO 2001 (p. 507), is at the low end of acceptable posted speed for an urban freeway, which is 50 mph. According to AASHTO, freeways are to have controlled access and provide high levels of safety and efficiency in the movement of vehicles at high speeds. Studies have been done to set the different types of speed limits for facilities to promote efficiency and safety. Higher freeway capacity at lower speeds is based on the premise that vehicles will travel closer together with reduced headways (spacing between vehicles). Urban motorists now typically travel at higher speeds with reduced headway between vehicles, and this has resulted in higher theoretical capacity for freeways. The Recommended Alternative design speed for the mainline is 60 mph. It is not acceptable practice to lower speed limits below 50 mph for an urban freeway.

Response 9-9

SEMCOG adopted its transit plan described in *Improving Transit in Southeast Michigan, A Framework for Action, October 2001*. I-94 was not included in the 12-corridor, 259-mile system. By including the transit plan as an illustrative element in its Regional Transportation Plan, SEMCOG is supporting the implementation of a transit system in Southeast Michigan. The costs for implementing three commuter rail lines included in the attached letter are not realistic based on the experience of other cities that have implemented commuter rail. The I-94 project study limits did not meet the ridership thresholds to make commuter rail an option in this corridor. The SEMCOG transit action plan supported that this section of I-94 is not beneficial for commuter rail. The costs quoted seem reasonable.

Response 9-10

SEMCOG adopted its transit plan described in *Improving Transit in Southeast Michigan, A Framework for Action, October 2001*. I-94 was not included in the 12-corridor, 259-mile system. The Recommended Alternative is not anticipated to deter other transportation improvements or community and regional development plans and is consistent with SEMCOG's transit vision for the region. The Recommended Alternative provides needed motorized and non-motorized mobility along the corridor; enhances the potential for economic developments; offers possible social, economic, and environmental improvements; as well as opportunity for increased transit service along the service drives. It satisfies the purpose and need for the project

as described in Chapter 2, especially in regards to the regional, interstate, and international freight mobility necessary for the region's and the nation's economy, as well as regional interstate freight mobility to the civil and national defense.

Response 9-11

The environmental impacts of the I-94 Rehabilitation Project are documented in this FEIS in accordance with the applicable state and federal laws and regulations. The human impacts have been reduced where possible. There are benefits to the Recommended Alternative in terms of noise barriers, safer facilities to drive, and less congestion. The number of displaced residences and businesses has been reduced from the DEIS, where 18 dwellings (single-family, duplexes and apartments) and 21 commercial, industrial or other structures are proposed to be acquired as compared to 34 dwellings and 23 structures, respectively in the DEIS (Section 5.1.2.1).

Impacts to the natural environment have been reduced to the extent possible. The Recommended Alternative will improve the quality of storm water leaving the roadway, will add noise abatement to benefit nearby residential neighborhoods, and will reduce congestion associated emissions from vehicles. See FEIS Sections 5.9, 5.6, and 5.5 respectively for discussions of storm water, noise and air quality benefits. No wetlands or floodplains are located in the project area. No wild and scenic rivers or natural areas are located in the project area. No long-term impacts to vegetation or wildlife are expected to occur. While four threatened plant species were known to occur in the vicinity of the project area, a field survey did not identify any federal- or state-listed threatened or endangered species in the project area. While the project will involve earthmoving activities to rehabilitate the existing roadway, it is expected to have only minor effects, if any, on the area geology. The glacial till soils present in the project area have been disturbed previously, and any impacts associated with the rehabilitation of I-94 will be minor.

The I-94 Rehabilitation Project plans are costly due to the urban section in which it is located and the nature of the proposed improvements. The improvements include an additional mainline lane in both directions, redesign and reconstruction of interchanges from east of I-96 to east of Conner, creation of continuous service drives, reconstruction of all bridges and cross streets, and rebuilding of all pedestrian facilities to meet ADA standards. The Recommended Alternative is not anticipated to deter other transportation improvements or community and regional development plans and is consistent with SEMCOG's transit vision for the region published in October 2001. I-94 was not included in the 12-corridor, 259-mile system. The project may be one of the most expensive rebuilding projects in the state's history, but the commercial vehicle (economic benefits) and personal vehicles will benefit with a safer and less congested facility.

Response 9-12

The Recommended Alternative, through elimination of the reserved median space and reduction of width along the service drives, reduces potential construction impacts and right-of-way acquisition from that of the DEIS Build Alternative. The Recommended Alternative addresses specific and pressing needs in the section between I-96 and Conner Avenue. The Recommended Alternative will not be constructed as three separate projects. The I-94 Rehabilitation Project is independently useful. Because the Recommended Alternative follows the existing alignment and right-of-way, it does not dictate what happens beyond its limits. Wyoming to I-96 and Conner to Masonic has been rehabilitated, with resurfaced pavement and replacement or rehabilitation of 51 bridges. No additional capacity was included and is not deemed necessary at this time. The need for additional capacity and other design features in adjacent sections will be assessed based

on traffic analysis performed specifically for those sections and will not be dependent on what happens between I-96 and Conner. The Cumulative Effects are described in FEIS Section 5.15 and considers only those projects currently listed in SEMCOG's 2025 Regional Transportation Plan.

Response 9-13

This FEIS addresses the justification of the project limits as part of FEIS Section 2.3: Description of Project Limits. I-96 and Conner are the logical termini for this proposed improvement due to the three freeway-to-freeway system connections to I-94, critical links to the local and international economy, failure to meet current design standards, crash rates above the statewide average, elevated congestion levels compared to adjacent sections, and repairs recently made to adjacent sections.

Rehabilitation of I-94 between Conner Avenue and Masonic Avenue is already complete; it has been patched and resurfaced and 51 bridges have been replaced or rehabilitated (2002). No additional capacity was included during this construction and none is planned in the near future. The needs of I-94 west of I-96 will be analyzed separately and will be based on needs present in that section. The Recommended Alternative will not require additional capacity or other improvements east or west to make it useful. Other projects, even though included in the short-range and long-range programs and plans, will proceed on their own schedule because they are independent projects.

Response 9-14

The mainline of I-94 has additional capacity needs based on the 2025 forecasts from SEMCOG's travel demand forecasting model. The proposed two-lane service drives of the Recommended Alternative meet the 30-foot width recommendation of the city of Detroit Planning Commission (See Comment 7-15) and are consistent with what is currently in the corridor. The service drives accommodate the future traffic volumes projected by SEMCOG's 2025 travel demand forecasting model, which considers future land use and development. The creation of continuous service drives for the length of the project improves access for neighborhoods located within the corridor and allows traffic, both motorized and non-motorized, to move east and west along the I-94 corridor without getting on the freeway. This reduces traffic on the freeway and eliminates the interference caused by vehicles entering and exiting the freeway. The service drives are also supported by local transit agencies. The 55-foot reserved median space has been removed as part of the Recommended Alternative and the additional mainline lane in each direction of I-94 has been retained to accommodate future traffic volumes.

Response 9-15

The I-94 Rehabilitation Project is a product of the regional transportation planning process managed by SEMCOG and the statewide transportation planning process. It has been widely recognized as a pressing need and important to the economic well-being of Southeastern Michigan and particularly the city of Detroit. The project will meet all applicable State and federal laws and requirements. This FEIS updates the air, noise, traffic, indirect and cumulative effects, and environmental justice analyses for the I-94 Rehabilitation Project. Section 7.13 of the FEIS details a preliminary plan for construction staging of the Recommended Alternative which addresses congestion management. The Recommended Alternative is consistent with the SEMCOG transit vision plan.

Response 9-16

This FEIS includes a refined purpose and need, and new, expanded analyses of air quality, noise, environmental justice, and indirect and cumulative effects to provide full detail. The EIS process addressed a wide range of alternatives and the needs and benefits of this project were recognized as a part of the regional and statewide transportation planning processes mentioned in Response 9-15. This project has adhered to National Environmental Policy Act (NEPA) recommendations regarding EIS process for evaluation and selection of the Recommended Alternative. Refer to figure 4-1 for the process diagram.

Response 9-17

A new air quality analysis meeting all applicable requirements was conducted for the Recommended Alternative and is discussed in Section 5.5 of this FEIS. Background CO concentrations used in the DEIS were based on 1998 concentrations from the Livonia monitoring station. The Linwood Station readings were not available for use for the DEIS. For this FEIS, the background concentrations were available and were utilized from the Linwood monitoring station, which is adjacent to the project corridor. No air quality violations are expected as part of the project.

Response 9-18

Transportation projects must meet specific requirements for mobile sources. This project complies with applicable State and federal air quality laws and regulations at this time. If standards change, an additional analysis will be considered. See FEIS Section 5.5.

Response 9-19

State and federal air quality regulations do not currently have standards in place for analyzing air toxics from mobile sources.

Response 9-20

Air pollution from construction equipment exhaust will be required by the MDOT to be limited by the use of filters and/or special fuels or the best practices and technology available at the time of construction.

Response 9-21

The implementation of the region's proposed transit system will not reduce traffic congestion, but rather will decrease the rate of congestion growth. As population grows, the challenge exists to invest in clean vehicles and a multi-modal transportation network that will keep people and goods moving while also maintaining the region's air quality for the health of all citizens. The MDOT will continue to work with transportation providers, local and regional governments, and other agencies to tackle this important challenge.

The air quality standards set for mobile sources by the USEPA are based on many health-risk studies. The studies are based on the at-risk population (asthmatics, children, and elderly). The air quality analysis performed for I-94 indicates that the project will not violate the applicable standards and will conform to the State Implementation Plan that will be performed for air quality by SEMCOG. Further information on air quality is contained in sections 5.5 and 7.16.

Response 9-22

Reducing the crash rates is part of the purpose and need for this project. In order to be able to reduce crashes, the freeway needs to be updated geometrically with the latest standards. Eliminating the left-hand on- and off-ramps will assist in reducing some of the crashes and allow better traffic flow. Providing acceleration and deceleration lanes also will assist in reducing crashes and improve traffic flow. The Recommended Alternative also will provide continuous service drives, which will separate regional and local traffic. A review of crash data included in Appendix B of the DEIS clearly indicates that existing crash rates between I-96 and east of I-75 exceed the regional average of 350 crashes per 100 million vehicle miles. Some links east of I-75 to east of Conner also exceed the regional average. In addition, crash rates exceed the regional average along M-10 and I-75 in the area where they interchange with I-94. The additional mainline lane in each direction, accompanied by the geometric updates to freeway elements, is intended to reduce crashes by providing better traffic flow and generally safer driving conditions.

Response 9-23

SEMCOG's Regional Transportation Plan and the MDOT's State Long Range Plan both clearly state that the project corridor is necessary to international and regional trade. Freight traffic data as described in Chapter 2 suggests that the project corridor is necessary to international and regional trade. Based on the 1995 traffic data, a significant portion of trucks (3–10 percent of total vehicular volume) utilize I-94 within the project limits. Due to I-94's link to international border crossings and the growing economy in Southeast Michigan, the volume of heavy-truck traffic on Southeast Michigan interstates is expected to grow at a rate three times faster than passenger vehicle volume.

Response 9-24

The environmental justice analysis provided in the DEIS has been revised, see Section 5.1.4 of this FEIS. All pedestrian walkways and crossings will provide modern and safe designs providing pedestrians with comfortable environments and complying with the AASHTO, FHWA, MDOT, and Americans with Disabilities Act standards. The project will provide new sidewalks, at a minimum of 6 feet wide, through the interchanges, along the service drives, and on all reconstructed cross streets. Pedestrian crossing locations will receive proper pavement markings, signage, and signalization. Coordination with the city of Detroit, DDOT, and the public has taken place regarding crossing locations and will be continued in the design phase of the project. Existing pedestrian-only crossings were retained wherever possible (Brooklyn/I-94 and Canfield/M-10 are the only removals, with Selden/M-10 being replaced with a pedestrian/vehicular bridge). The Recommended Alternative offers a total of six pedestrian crossing opportunities along I-94 and two along M-10. Where a pedestrian-only crossing has been removed, there is an alternate crossing within three blocks; for Brooklyn Street it is west at Trumbull Avenue or east through the M-10 interchange and for Canfield it is north at Forest Avenue or south at Selden Avenue. The Recommended Alternative only removed a total of three pedestrian/vehicular crossings (47 existing versus 44 for the Recommended Alternative) within the I-94 study corridor compared to the existing conditions. All crossings are accommodated within three blocks of the existing location.

Response 9-25

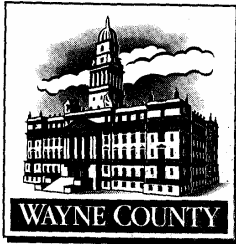
The Recommended Alternative for the corridor eliminates the reserved median space.

Response 9-26

In accordance with Federal Highway Administration (FHWA) regulation 771.129(a) Re-evaluations, a letter was issued to FHWA in October 2004 addressing that no major changes to the project have taken place requiring a supplemental or new DEIS. FHWA concurred that the information presented in the DEIS is still valid and there are no significant changes in the project, its surroundings, impacts, or issues that would warrant a Supplemental DEIS in November 2004. The project currently is listed as the top priority for the Michigan Department of Transportation in its State Long Range Plan for 2000-2025 and is only one of a number of interstate improvement projects planned by the State. The Rehabilitation of I-94 is consistent with SEMCOG's transit vision for the region (I-94 was not included in the 12-corridor, 259-mile system), provides accommodation for certain transit elements, and does not propose to impede the development of a mass transportation system in southeast Michigan. This project is part of a multi-modal transportation plan for southeast Michigan and all modes are needed to meet the transportation needs of the region. Transit will be an important part of the Detroit transportation system in the future; however, transit will not replace the need for an improvement to I-94 between I-96 and Conner Avenue to meet current transportation needs.

As part of this FEIS, data has been updated to the year 2025 (including land use, aesthetics and visual resources, air quality, noise, contamination, drainage and water quality, construction impacts, cultural resources, indirect and cumulative effects analysis, and public involvement), but no significant changes to the project have occurred requiring a supplemental or new DEIS. The I-94 Rehabilitation Project had an extensive review with the City of Detroit and a Detroit City Council Resolution was passed unanimously on August 1, 2003 in support of the Recommended Alternative. The updates for a 2025 analysis year, as well as the continued coordination, have kept the Recommended Alternative current and not requiring a supplemental DEIS.

Letter 10: Wayne County, Department of Public Services



Edward H. McNamara
County Executive

Wayne County Department of Public Services
Division of Engineering—Director's Office

415 Clifford Street, 3rd Floor
Detroit, Michigan 48226

313-224-7758 • Fax: 313-224-7773

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JUL 11 2001

PARSONS BRINCKERHOFF
DETROIT, MI

July 6, 2001

Mr. Jose Lopez
Public Hearing Office
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

RE: Proposed I-94 Rehabilitation Project
FHWA-MI-EIS-01-01-D

Dear Mr. Lopez:

I am writing this letter on behalf of the Wayne County Department of Public Services – Engineering Division expressing our support for the “Build Alternative” described in the referenced document. The Build Alternative will address the pavement, structure, capacity and safety deficiencies that currently exist on that segment of the freeway. Additionally, the proposed service drives provide improved access to the area enhancing transit, non-motorized travel and business development opportunities while minimizing disruption and displacements. I hope you find our supporting comments useful in your decision-making process. Feel free to contact me if I can be of further assistance (313-224-7762).

Sincerely,

WAYNE COUNTY DEPARTMENT OF PUBLIC SERVICES

Kevin L. Maillard, P.E.
County Highway Engineer
Director of Engineering

KLM: KMK

Cc: Ken Kucel

printed on recycled paper

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Response 10-1

Comment acknowledged.

General Summary and Response to DEIS Comments

The distribution of the DEIS included a formal comment process in which there were two public hearings held at different locations and times within the project corridor and a 45-day comment period ending March 27, 2001. The public hearings were held at the Charles H. Wright Museum of African American History and Kettering High School respectively on March 5 and 6, 2001, from 3:30–5:00 PM and 7:00–8:30 PM. Individuals and organizations were invited to submit comments on the DEIS at the public hearings by making verbal statements to a stenographer or submitting a comment form, and during the DEIS comment period by submitting comments through mail, fax, and e-mail.

General summaries of all comments received on the Draft Environmental Impact Statement for the I-94 Rehabilitation Project and the corresponding responses are presented in this section. In addition to the reviewing and governmental agencies documented in the previous section, the following organizations and businesses submitted comments on the DEIS: Wayne State University; Arab Community Center for Economic and Social Services; Greater Downtown Partnership; Michigan Association of Railroad Passengers; Michigan Environmental Justice Coalition; New Center Council, Inc.; Transportation Riders United (TRU); University Cultural Center Association; Ackerman & Ackerman, P.C. (on behalf of CMC Co.); Law Offices of Myckowiak Associates; Railway Systems Engineering Corporation; Soave Enterprises, LLC; and Whiting Distribution Services, Inc.

Table 8-3 classifies comments by the method received.

The issues addressed in the 23 organizational comments, 182 individual comments, and 529 postcards are summarized in Table 8-4. The table is organized by identifying the number of comments received and distributing the comments by issue and type.

The ten government agency letters, along with letters received from 13 non-governmental organizations (such as New Center Council, Inc.), were categorized as “organizational comments”.

The remaining oral and written comments were categorized as general public comments or “individual comments”. The general public comments consisted of 182 individual comments and 529 postcards.

Table 8-3: Number and Percentage of Total Comments by Method Received

Comment Type	Number of Comments	Percent of Total Comments
Reviewing Agency Comments	4	1 %
Mailed Comments	562	77%
Comment Box Comments	7	1%
Faxed Comments	14	2%
E-mailed Comments	114	15%
Mail Addressed to the Governor and Others	9	1%
Public Hearings	24	3%
TOTAL COMMENTS	734	100%

The comment summaries and corresponding responses presented below are a good faith attempt to respond to the major concerns raised regarding the DEIS. The concerns are summarized by the following topics: build alternative; transit; pedestrian access/bridges; environmental justice; indirect (secondary) and cumulative impacts; property acquisition; cost; air quality; noise; drainage; historic/archeological preservation; neighborhood impacts and business impacts; construction impacts; visual impacts; and project scope. Copies of the complete set of individual and special interest comments are contained in a separate bound Appendix J.

Build Alternative Elements

The majority of public comments were directed against the DEIS Build Alternative, with greater than half of all respondents calling for a form of mass transit. The comments supporting the DEIS Build Alternative were mostly concerned with alleviating current congestion on I-94 and other Detroit roadways. Other support for the DEIS Build Alternative came from citizens expressing relief that their homes would remain intact and would not be acquired as part of the right-of-way for the project. Some of the issues raised regarding Build Alternative elements follow.

Table 8-4: DEIS Comments Summary

Issue	Organizational Comments n=23	Individual Comments n=182	Postcards n=529
Air quality	8	17	357
Build alternative	19	151	0
Business impact	3	0	0
Construction impacts	5	1	0
Cost	6	29	0
Cumulative impacts	6	3	0
Drainage	3	1	357
Environmental justice	2	6	357
Extend comment period	2	2	0
Historic, archaeological preservation	2	3	0
Mainline lane configuration	6	10	0
Maintenance of traffic	5	11	0
Pedestrian access	5	2	0
Neighborhood impacts	4	17	172
Noise	7	14	357
Pedestrian bridges and movement	3	4	0
Project scope-segmented project	10	15	0
Property acquisition	3	6	0
Reserved median space	5	9	357
Three-lane service drives	6	7	0
Transit and mobility	4	97	357
Visual impacts	5	1	0
Total Number of Issues Raised in Comments	67	198	1,243

n= number of comments by group

Need for reserved median space

The Recommended Alternative for the corridor eliminates the reserved space in the median for future lane expansion or transit use. Refer to Section 4.4 of this FEIS for more information.

Increased mainline laneage

Current congestion and a predicted 35 percent increase in peak hour traffic by 2025 require additional capacity to meet current and projected demand. An additional through traffic lane in each direction has been recommended to meet these needs. This need also has been recognized in the SEMCOG and MDOT 2025 transportation plans.

Need for three-lane service drives

The Recommended Alternative reduces the width of the service drives to two 11-foot through lanes and an 8-foot shoulder; and as a refinement proposes a 3-lane section from M-10 to I-75 on the south side of I-94 to address capacity needs in the design year. This change from the DEIS Build Alternative reduces impacts where three lanes are not needed and provides additional capacity where the additional lane is needed near Wayne State University.

Need for expanded traffic capacity

The MDOT considers Level of Service (LOS) A through D desirable for Michigan roadways, but LOS E is acceptable in urban areas such as Detroit. I-94 currently operates at LOS E and F within the project limits. As traffic volumes increase in the future, the level of service will become worse. Increased congestion adversely impacts the economy of Southeast Michigan by increasing the cost of travel, which is a significant component of business cost. This expense is closely tied to the capacity, speed, and flexibility of the transportation infrastructure.

The analysis of future year 2025 conditions, contained in *Traffic Report Volume 3: Simulation of Year 2025 Conditions*, predicts that the No-Build Alternative will experience widespread congestion in both the AM and PM peak hours. For both peak hours, several corridor segments are expected to operate at LOS F.

The future year 2025 traffic analysis of the Recommended Alternative, however, showed significant improvements in traffic operations. The Recommended Alternative provides for safer vehicular weaving, has the potential for fewer crashes due to an updated design, and a smoother ride. The additional lane in each direction of the I-94 mainline addresses the capacity deficit experienced currently and expected under 2025 conditions. With the improvements to the interchanges and the additional lane in each direction along the mainline, the level of service in the project area will improve and operate at LOS E or better.

Negative environmental consequences of freeway expansion and increased traffic

The environmental impacts of the I-94 Rehabilitation Project are documented in this FEIS in accordance with the applicable state and federal laws and regulations. The Recommended Alternative will improve quality of storm water leaving the roadway with a new underground drainage system. The system will include oil/water separators, discharge controls, inline detention basins, and other features that will reduce pollutants and sediments in the stormwater runoff. Maintenance operations such as catch basin cleaning and pavement sweeping will also reduce stormwater pollution. These features will minimize the potential negative effects on overall water quality. The Recommended Alternative will also add noise abatement to benefit

nearby residential neighborhoods and will reduce congestion associated emissions from vehicles. Negative consequences will be limited as quality of life improves.

Residential street access at service drives

Detailed discussions have taken place between the City and MDOT regarding the continuous service drives, and specific issues such as signalization, speed, and local street access. Further coordination will occur in the design and construction phases of the project regarding residential access at service drives.

Transit

More than half of the comments received called for a form of mass transit. The major issues raised in the comments are summarized below.

Consideration of additional transit alternatives

A frequent comment by respondents was that additional transit alternatives should have been considered beyond the DEIS Build Alternative. Following the DEIS Public Hearing, held March 5–6, 2001, and the receipt of public and agency comments on the DEIS, three modifications to the DEIS Build Alternative were developed to respond to the major concerns identified by these groups. All three modifications to the DEIS Build Alternative scaled down one or more components (service drives and/or median space) of the DEIS Build Alternative, and combined with the DEIS Build Alternative, offered all possible combinations of medians with and without reserved space, and two- and three-lane service drives. Concurrent with the development of the three modifications to the DEIS Build Alternative, SEMCOG adopted *Improving Transit in Southeast Michigan: A Framework for Action*, as an illustrative element in the 2025 Regional Transportation Plan on Oct. 25, 2001. The report assessed transit within the Detroit metropolitan area and identified a 12-corridor, 259-mile transit system within southeast Michigan. The mainline of I-94 was not identified as a transit corridor for rail or high-speed buses.

In accordance with Federal Highway Administration (FHWA) regulation 771.129(a) Re-evaluations, a letter was issued to FHWA in October 2004 addressing that no major changes to the project have taken place requiring a supplemental or new DEIS. FHWA concurred with the re-evaluation letter in November 2004. The project currently is listed as the top priority for the Michigan Department of Transportation in its State Long Range Plan for 2000-2025 and is only one of a number of interstate improvement projects planned by the State. The Rehabilitation of I-94 is consistent with SEMCOG's transit vision for the region, provides accommodation for certain transit elements, and does not propose to impede the development of a mass transportation system in southeast Michigan. The issue of transit is regional and cannot be addressed by this project alone. The Recommended Alternative for the corridor, described in FEIS Section 4.4, does not include a transit component such as rail or high-speed buses; the reserved space in the median for future transit has not received the same level of support that it did prior to the release of SEMCOG's transit vision for the region. However, there is still strong community support for a transit system in Southeast Michigan, and the design of the Recommended Alternative will accommodate bus services within the corridor. Transportation measures compatible with the Recommended Alternative are described in FEIS Section 4.5.

As part of this FEIS, data has been updated to the year 2025 (including land use, aesthetics and visual resources, air quality, noise, contamination, drainage and water quality, construction impacts, cultural resources, indirect and cumulative effects analysis, and public involvement),

but no significant changes to the project have occurred requiring a supplemental or new DEIS. The I-94 Rehabilitation Project had an extensive review with the City of Detroit and a Detroit City Council Resolution was passed unanimously on August 1, 2003 in support of the Recommended Alternative. The updates for a 2025 analysis year, as well as the continued coordination, have kept the Recommended Alternative current and not requiring a supplemental DEIS.

Need for mass transit or alternative means of transportation as opposed to a freeway-widening project

The most widely voiced transit comment was that of the need for mass transit as opposed to a freeway-widening project. As stated in Chapter 2 and Response 9-6, the project portion of the I-94 Rehabilitation Project is a critical section of the National Interstate and defense Highway System: It consists of two major freeway-to-freeway interchanges and five interchanges with local arterial streets in the city of Detroit; and it is a major connector to downtown Detroit and international trade routes. The project portion of I-94 was constructed in the 1940s and early 1950s and requires frequent maintenance of the aging pavement, bridges and other infrastructure. The need for rehabilitation of the project portion is further supported by the outdated design that includes left-on and left-off ramps and insufficient acceleration and deceleration lanes, thereby resulting in safety and operational problems; and insufficient capacity to meet 2025 traffic demand projections for automobiles and heavy vehicle traffic. The project is currently listed as the top priority for the Michigan Department of Transportation in its State Long Range Plan 2000–2025; however, it is only one of a number of interstate improvement projects planned by the state. The rehabilitation of I-94 is planned in accordance with SEMCOG's transit vision for the region, provides accommodation for certain transit elements, and does not propose to impede the development of a mass transportation system in Southeast Michigan. Southeast Michigan will require a multi-modal transportation system to meet its transportation needs and one modal improvement will not obviate the need to make other improvements.

DEIS relation to a transit vision

A couple agencies questioned how the project is going to be coordinated with regional plans for transit. Since I-94 was not recommended as one of the 12 corridors in SEMCOG's *Improving Transit in Southeast Michigan: A Framework for Action*, the reserved space in the median for future transit has not received the same level of support that it did prior to the release of this SEMCOG report. As described in FEIS Section 4.5, the Recommended Alternative proposes improvements to the corridor that allow for transit accommodation in a manner consistent with applicable regional and local government plans for transit.

Coordination with existing transit agencies and facilities

A few comments questioned how the project was addressing public transportation and coordination with existing providers such as DDOT and SMART. Coordination with transit agencies such as DDOT and SMART has been ongoing throughout project planning and during selection of the Recommended Alternative. Both agencies have expressed support for the proposed design, shown interest in utilizing the continuous service drives to expand bus service within the corridor, and have communicated specific service-related requirements to the MDOT. The MDOT is committed to working with these agencies for the duration of the project and will continue to seek transit agency input during the design phase to ensure that their specifications

for enhanced transit service within the corridor are met and that any disruptions to existing service are minimized.

Use of the DEIS Build Alternative reserved median space

A number of respondents expressed concern over the use of the reserved space and that it would “unlikely be effective as a transit use in the future” and that it would be unattractive and require long crossing distances. The Recommended Alternative for the corridor eliminates the reserved space in the median for future lane expansion or transit use. Refer to FEIS Section 4.4.

Use of the service drives to improve transit

There were a few agency and special interest group comments expressing concern that the new service drives would not provide opportunity for improved transit. The Recommended Alternative proposes continuous service drives on the north and south sides of the corridor for the entire length of the project, including the sections through the interchanges. The service drives will consist of two 11-foot through lanes and an 8-foot shoulder. The section between M-10 and I-75 on the south side of I-94, bordering Wayne State University, will consist of three through lanes to address the traffic volumes.

DDOT and SMART have expressed interest in using the continuous service drives for expanded bus service along the corridor. The Recommended Alternative provides space for service elements such as bus turnouts and shelter areas, and coordination with these agencies regarding these types of facilities will take place during the design phase of the project. Additionally, the 8-foot shoulder will provide opportunities for improved transit along the service drives by providing space for bus stops. FEIS Section 4.5 describes some of the motorized and pedestrian and bicycle options compatible with the Recommended Alternative.

Pedestrian Access/Bridges

The comments on pedestrian access/bridges generally focused on improvements. Some the most frequently raised issues are as follows.

Pedestrian safety in the design of walkways and crossings

Several comments focused on the need for safe design of walkways and crossings. All pedestrian walkways and crossings will provide modern and safe designs complying with the AASHTO, FHWA, MDOT and ADA standards. The project will provide new sidewalks, at a minimum of 6 feet wide, through the interchanges, along the service drives, and on all reconstructed bridges and cross streets. Where vehicular and pedestrian conflicts are determined to be a potential problem, barriers (such as raised curbs, planter boxes, or bollards) will be used to prevent errant vehicles from encroaching on pedestrian areas.

Location of pedestrian walkways to reflect patterns of use, cross-corridor access and access to specific corridor locations

A few agency and special interest comments focused on this need. The proposed reconstruction of I-94 will improve overall pedestrian circulation within the corridor and provide more efficient movement between north and south and east and west sides. Many of the existing streets within the corridor do not have adequate pedestrian crossing facilities. The project will provide new sidewalks, at a minimum of 6 feet wide, through the interchanges, along the service drives, and on all reconstructed bridges and cross streets. Pedestrian-crossing locations will receive proper markings and signage, signalization, and will be able to accommodate Intelligent Transportation

Systems Technology. The City has reviewed all proposed pedestrian crossings during this FEIS phase of this project. Pedestrian crossings of I-94 will be accommodated with safe designs. The MDOT has been working with the City and the community assessing the location and need of the various locations to determine if the current facilities are in the most appropriate location based on land uses. Coordination with the public, agencies, and the city of Detroit, as well as continuation of Context Sensitive Design workshops in the design phase of the project, will help determine specific features at crossings.

Elimination of pedestrian-only bridges and reduction of pedestrian crossings

A few comments expressed concern over the removal of pedestrian bridges and reduction in crossings. As stated in the previous response, significant improvements in pedestrian circulation are expected with the Recommended Alternative. The existing conditions (on I-94 from I-96 to east of Conner Avenue, on M-10 from Milwaukee to Selden, and on I-75 from Milwaukee to Warren) has 37 pedestrian/vehicular crossing opportunities and ten pedestrian-only crossings. With the Recommended Alternative there are still 36 pedestrian/vehicular crossings and eight pedestrian-only crossings (six along I-94 and two along M-10). The Recommended Alternative will enhance pedestrian access and connectivity with new continuous sidewalks on all the service drives, which parallel I-94 and go through the interchanges at M-10 and I-75. In addition, all cross (local) street bridges will be built to accommodate pedestrians. The pedestrian crossing locations will have new pavement markings, signage, and signalization. The MDOT worked with the city of Detroit and the community to assess and determine if the current pedestrian-only bridges are in the appropriate location based on land uses. Existing pedestrian-only crossings were retained wherever possible (Brooklyn (I-94) and Canfield (M-10) are the only removals, with Selden (M-10) becoming a combined pedestrian/vehicular bridge). The Recommended Alternative offers a total of six pedestrian-only crossing opportunities along I-94 and two along M-10. Public involvement with the community and the city of Detroit will continue through the design phase of this project and will be used to obtain feedback on pedestrian access within the corridor. Section 5.1.2.3 of this FEIS describes the expected changes in pedestrian and bicycle access within the corridor. All pedestrian facilities for the Recommended Alternative will meet state, federal, and ADA (American Disability Act) standards. The Recommended Alternative provides similar crossing opportunities with the existing conditions (only three less) and all crossing opportunities are within three blocks or less of an existing facility.

Pedestrian and bicyclist safety along the service drives

A few comments expressed concern over unsafe conditions/bicycles along the service drives. A comment for example stated that “the sidewalks, as shown in the EIS, would be virtually unusable because of their proximity to the service drives where traffic will be passing by at up to 60 mph.” All sidewalks proposed for the corridor are intended for pedestrian use and will be designed to accommodate safe pedestrian travel. The 8-foot shoulder could be converted to a dedicated bicycle lane or used to extend the width of sidewalks beyond the current width of a 6-foot minimum as determined by the city of Detroit. Mitigation measures, such as separation barriers, will be applied in cases where elements of the roadway make pedestrian or bicycle travel unsafe. Posted speed limits will be determined by the city of Detroit and will not exceed appropriate residential speeds. Signalization and other traffic-calming measures also will be present along the service drives.

Pedestrian bridges and parks over freeways near the Wayne State campus

There was some concern over the removal of pedestrian bridges near the Wayne State University Campus. Wayne State University requested pedestrian parks in several crossing locations. The MDOT is not intending to provide parks or land-bridges over the freeways adjacent to Wayne State University or in any location along the I-94 corridor. Past experience has shown that these structures are far too costly and difficult to maintain. Implementation of the Recommended Alternative would result in the removal of two pedestrian-only bridges, leaving six remaining pedestrian-only bridges. The first is the Brooklyn Street pedestrian bridge over I-94, which is located between Trumbull Street and M-10. The second is the Canfield Avenue pedestrian bridge, located south of I-94 and Forest Avenue (See FEIS Section 5.1.2.4). Coordination with Wayne State occurred regarding the removal of these crossing locations and no reservations regarding these two locations were expressed. Specific requests for pedestrian bridges will be coordinated during the design phase of this project.

Environmental Justice

Impacts on minority and low-income residents within the corridor

Comments related to environmental justice focused on negative consequences of increased highway traffic on the health of residents and the community impacts to the low-income and minority population in the project area.

Outreach to the community has been a significant component of the I-94 Rehabilitation Project since its inception. In response to the public and agency comments received on the DEIS, and concerns over community impacts, three modifications to the DEIS Build Alternative were developed. The MDOT's Recommended Alternative for the corridor significantly reduces the impacts of the DEIS Build Alternative through the elimination of the 55 feet of reserved median space and the reduction of lanes on the service drives. The estimated number of displacements has been reduced to approximately 42 structures from the nearly 70 structures for the DEIS Build Alternative. Section 5.1.4 of this FEIS provides an updated environmental justice analysis for the project and describes expected improvements such as community facilities and services, neighborhood cohesion, and pedestrian and bicycle mobility within the corridor. Mitigation addressing environmental impacts will be considered, as appropriate.

Environmental Justice analysis methodology

A few agencies and special interest groups felt that the environmental justice analysis was "flawed" and not in conformance with Federal Executive Orders. An environmental justice analysis conforming to current practices and guidelines has been conducted for the Recommended Alternative. Refer to Section 5.1 of this FEIS for more information.

Indirect (Secondary) and Cumulative Impacts

Economic impact of the project on the city of Detroit.

A couple comments expressed concern with how the project's economic impact on the city of Detroit was addressed in the DEIS and whether the project would promote urban sprawl and disinvestments from the central City. Sections 5.2 and 5.15 contain updated analyses for the Recommended Alternative. As described in FEIS Section 5.2, the Recommended Alternative is expected to contribute to the economic vitality of the City and region and is consistent with local and regional economic goals.

Creation of a barrier between New Center area and University Cultural Center

A couple comments were concerned with the creation of neighborhood barriers as a result of the project and an area noted was New Center and the University Cultural Center. The Recommended Alternative cross-section is significantly reduced from the width of the DEIS Build Alternative, due primarily to the elimination of reserved median space and two-lane service drives, enabling the proposed reconstruction to remain on the existing freeway alignment. Refer to FEIS Section 4.4. The reduced width of the Recommended Alternative, the improved crossing opportunities over the I-94 freeway (through the interchanges, over 2nd Street, Cass Avenue, Woodward Avenue, and Brush Street), and the continuous service drives and sidewalks through the interchange areas are expected to maintain, if not enhance, the connection between New Center and the University Cultural Center.

Indirect and Cumulative Impacts analysis methodology

A few agencies and special interest groups felt that the Indirect and Cumulative Impacts analysis presented in the DEIS was inadequate and in violation of NEPA. FEIS Section 5.15 contains an updated Indirect (Secondary) and Cumulative Impacts Analysis for the Recommended Alternative which is based on the methodology contained in the Maryland State Highway Administration's Secondary and Cumulative Effects Analysis Guidelines for EISs and EAs. The Maryland guidelines have been widely recognized as meeting all requirements. As part of the preparation of this FEIS, a project-specific methodology based on Maryland guidelines was submitted to the regional Environmental Protection Agency office and coordination meetings were held to obtain approval of how the analysis would be updated for this FEIS. The approved methodology is included in Section 5.15 of this FEIS.

Property Acquisition

Impacts to specific properties within the corridor

A few businesses and citizens were concerned with specific impacts to their properties. The businesses were concerned with how the project would impact operations. The MDOT Real Estate will contact each property owner regarding the acquisition of specific properties during the final design stage and will follow established MDOT procedures. It will begin with a preliminary interview and proceed with appraisals, negotiations, presentation of an offer, response by the property owner, and eventually a signed document. All closing costs will be paid by the MDOT. Payment for the required property will be received within 60 days of agreement. The MDOT is required to pay fair market value, which is defined to be the highest price estimated in terms of money the property would bring if offered for sale in the open market, with a reasonable time allowed to find a buyer, buying with the knowledge of all the uses to which the property is adapted and for which it is being used. Relocation advisory assistance will be available as necessary, and reasonable moving costs will be paid. This process will begin when design has proceeded far enough to determine exact right-of-way needs. More information is available from the MDOT offices. Refer to Appendix C for the Conceptual Stage Relocation Plan for the Recommended Alternative.

Costs

High project cost and impact of spending the money here and not on public/mass transit

A number of comments stated that the cost of the DEIS Build Alternative was too great and the money would be better spent on transit-related improvements. Transit is a regional issue and the

need for the I-94 Rehabilitation Project still exists. The I-94 Rehabilitation Project is not anticipated to deter other needed transportation improvements in the Detroit metropolitan area and Southeast Michigan, but addresses existing safety and capacity issues in the corridor.

A Purpose and Need is being written and an alternatives analysis has begun to address transit between downtown Detroit and Metro Airport. This corridor was one of the 12 identified in the SEMCOG transit plan. Southeast Michigan needs a multi-modal transportation system to meet its needs, and I-94 is just one project in a program of projects needed to meet the needs of southeast Michigan. Other improvements are needed on area freeways, including improvements to I-96 and I-75, to address future traffic volumes and safety issues. Transit is a regional issue and will not be addressed as part of this project.

Maintenance costs among alternatives

Concern with high maintenance costs was primarily voiced by agencies and special interest groups. Cost information for the No-Build Alternative, Build Alternative, and modifications is presented in Section 4.7 of this FEIS. It is assumed that the No-Build Alternative will require frequent maintenance. The maintenance cost of this alternative will be significant because replacement of all bridges and pavement that have exceeded their design life.

The Enhanced No-Build Alternative proposes planned but limited improvements to the existing freeway. As such, new bridges, pavement, and existing freeway elements will require maintenance; however, there will be no additional lanes to maintain.

The Recommended Alternative provides new pavement, bridges, drainage, and additional lanes, which will figure into the maintenance cost of the Recommended Alternative. The Recommended Alternative proposes four through lanes along the mainline of I-94 and continuous service drives for the length of the project. The Recommended Alternative will not have the wider median to be maintained on the I-94 freeway mainline. The Recommended Alternative also will have two-lane continuous service drives (with the exception of three lanes on the south side of I-94 between M-10 and I-75) instead of the three proposed in the DEIS Build Alternative. These reductions will reduce maintenance costs. A further factor influencing the maintenance cost of the Build Alternative and modifications will be the decision to include specific mitigation and enhancement treatments. Specific costs to maintain mitigation and enhancement treatments have not been determined and will be developed with stakeholders through Context Sensitive Design workshops.

Air Quality

Air Quality analysis methodology

The comments related to the Air Quality analysis methodology requested greater detail in the FEIS and voiced concern over the use of the Livonia monitor. The updated FEIS air quality analysis complies with applicable state and federal laws and regulations. The methodology is detailed in Section 5.5 of this FEIS. Background CO concentrations used in the DEIS were based on 1998 concentrations from the Livonia monitoring station. The Linwood Station readings were not available for use for the DEIS. For this FEIS, the background concentrations were available and were utilized from the Linwood monitoring station, which is adjacent to the project corridor. No air quality violations are expected as part of the project.

Air pollution and health problems

The majority of comments on air quality revolved around possible negative consequences of the project. The air quality standards set for mobile sources by the USEPA are based on many health risk studies. The studies are based on the at-risk population (asthmatics, children, and elderly). The air quality analysis performed for I-94 indicates that the project will not violate the applicable standards. The project also was found to conform with the State Implementation Plan for air quality by SEMCOG. Further information on air quality is contained in Sections 5.5 and 7.16.

Noise

Noise impacts

The majority of comments on noise indicated concern over possible negative consequences of the project and what would be done for abatement. Noise barriers will be provided where appropriate and effective consistent with the FHWA and MDOT policy. Three barriers are currently proposed for the project corridor. Refer to Section 7.6 of this FEIS for more information. The final design process will re-evaluate the need for noise barriers in specific corridor locations. The construction phase of the project will mitigate for noise impacts as described in Section 7.15 of this FEIS.

Drainage

Stormwater retention

The issue of drainage was raised primarily by agencies. Concern was with pollution from stormwater run-off and how drainage would be incorporated in the design. The Recommended Alternative for the corridor will provide a new drainage system. Any increased run-off due to the additional paved areas of the Recommended Alternative will be detained on-site through in-line detention, (surface detention will also be evaluated for areas within the interchanges), and metered back into the city of Detroit sewer system at a rate not to exceed the current maximum flow. In-line detention or detention ponds in the interchanges will be used. This has been discussed and coordinated with the city of Detroit.

Historic Preservation

Preservation of historic properties

Comments related to historic preservation dealt with the documentation process, minimizing impacts and providing appropriate mitigation. All impacts and measures to mitigate impacts to Section 4(f) properties are documented in Chapter 6. Extensive consultation and coordination with local community representatives, the SHPO, and ACHP have taken place regarding impacts to historic properties within the corridor. A Historic Resources Workshop for the project was held in November 2003 to discuss impacts to historic resources and mitigation measures with the community, SHPO, and city of Detroit. The Recommended Alternative requires less right-of-way than the DEIS Build Alternative; but it will still affect four historic resources: the Woodbridge Neighborhood Historic District, the I-94/M-10 interchange, the Square D/Detroit Fuse and Manufacturing Company Building, and the United Sound Systems Recording Studio.

Alternate locations for the proposed action that would avoid the taking of the historic structures were considered and were found not practical because the project involves the reconstruction of

an existing roadway with minimal need for additional rights-of-way. Other locations outside the immediate area would not provide necessary system connections and would require significant new rights-of-way. Due to the proximity of the I-96, M-10, and I-75 interchanges, ramp locations are tightly controlled. Ramp configurations that would avoid the three buildings are not possible without incurring other historic impacts.

The MOA for the M-10 interchange and bridges, United Sound Systems Recording Studios, 5287 Hecla Street, and the Square D/ Detroit Fuse and Manufacturing Company Building has been completed and is contained in Appendix E.

Neighborhood and Business Impacts

Impact on neighborhoods and businesses near I-94

Several comments were concerned with project impacts to adjacent neighborhoods and businesses. The neighborhood impacts of great concern included added health risks, in particular asthma, associated with pollution increases from widened and highly traveled roadways, and noise and disruption caused by expanded service drives. Several letters mentioned the Fourth Street neighborhood as a location where the DEIS Build Alternative would cause detrimental impacts. Businesses were concerned with impacts to their operations and relocation assistance. The MDOT will work with the neighborhoods and businesses in the corridor to minimize any impacts to areas that would arise from the project, support neighborhood revitalization programs and economic development goals, encourage neighborhood stability, improve neighborhood connections, and improve aesthetics. Businesses and residents that must be relocated will receive assistance and will be encouraged to locate in the same area. Improved service drives and sidewalks will improve circulation within the area and aid locals in going about their daily business. Refer to Chapter 5 for a description of these issues.

Construction Impacts

Impacts on disadvantaged populations

A few comments were concerned with adverse construction impacts on the study area population and the proposed mitigation for impacts. The Recommended Alternative, with the removal of the 55-foot median space and reduction of width, reduces some of the potential construction impacts of the project. Construction impacts to the community were addressed in Chapter 5 and a discussion of mitigation measures is included in Chapter 7.

The environmental justice analysis for the project specifically focuses on the construction impacts to minority and low income populations. The analysis notes that the Recommended Alternative provides greater benefits to the community than the No-Build Alternative, Enhanced No-Build Alternative, DEIS Build Alternative and other modifications. The Recommended Alternative provides continuous service drives and sidewalks that aid in community connectivity, reduces congestion, improves safety and traffic operations, improves design, and minimizes displacements. Although adverse impacts will occur during project construction, the issue exists in all alternatives, including the No-Build Alternative, since the freeway and bridges in the corridor are in poor condition and need to be rehabilitated. Mitigation measures to address impacts such as air, noise, and vibration are discussed in FEIS Section 5.5-5.7. Some of the mitigation measures identified how to handle the construction phasing, the need for an effective traffic management plan, and the building of noise barriers in the locations where the State criteria indicates a need.

Impacts on City and City services

A few comments were concerned with construction impacts to City facilities and services and the duration and staging of construction. The MDOT will make every effort to reduce the duration of construction and minimize disruptions. Coordination will be ongoing with affected city of Detroit departments before and during the construction phases of the project. Chapter 7 describes the temporary impacts that can be expected as part of the project and measures to mitigate impacts. The construction plans will provide more detailed information on phasing and measures to mitigate impacts.

Visual Impact

Aesthetic/functional treatments

Several comments suggested specific treatments for the corridor, such as the use of brick retaining walls instead of terraced walls, or planter boxes to separate pedestrians from vehicular traffic. In addition to visual impact, the desires for various treatments related to maintenance and safety issues were expressed. The decision to include specific treatments will be based upon input received from the general public, stakeholder agencies, and the city of Detroit as well as the consideration of issues such as cost, maintenance, and safety. Three workshops (refer to Appendix G) were held as part of the project to obtain feedback on aesthetics and treatments for the corridor and will continue into the design phase of the project through Context Sensitive Design Workshops. FEIS Section 5.4 describes how the project intends to meet local and regional aesthetic goals.

Project Scope

Project limits

A few comments were concerned that the limits of the project were not large enough and that the DEIS did not address plans for other sections of I-94. The I-94 project limits begin just east of the I-94/I-96 (Jeffries Freeway) interchange and extend 6.7 miles to just east of the I-94/Conner Avenue interchange. The project limits also include portions of M-10 and I-75. The traffic study limits are broader than the project limits, extending along I-94 from Wyoming Avenue to I-696. The traffic limits were to be of sufficient length to identify operational issues within corridor and test alternatives considered as part of the project.

This FEIS addresses the justification of the project limits and rationale for project termini in Chapter 2, *Purpose of and Need for the Proposed Action*. I-96 and Conner are the logical termini for this proposed improvement due to the three freeway-to-freeway system connections to I-94, critical links to the local and international economy, failure to meet current design standards, crash rates above the statewide average, elevated congestion levels compared to adjacent sections, and repairs recently made to adjacent sections.

Lack of transit alternatives considered

Several comments stated that the project scope was too narrow and should have considered additional transit alternatives. The alternatives considered as part of this project arose out of an extensive public involvement process and coordination with stakeholders, local, state, and federal agencies. Alternatives considered as part of this project have included HOV lanes and a rail facility in the median of the freeway. The Recommended Alternative for the corridor is consistent with the SEMCOG transit vision for Southeast Michigan. The adopted SEMCOG

transit plan does not include the I-94 corridor as one of the 12 recommended transit corridors. Outside of the I-94 Rehabilitation, other transit initiatives are being pursued in Southeast Michigan. One of the studies currently underway includes the Ann Arbor to Metro Airport to Downtown Detroit transit alternatives analysis. Refer to Chapter 4 of this FEIS for more information on alternatives considered.